

**PLAINTIFF'S OBJECTIONS
TO DEFENDANTS'
TRIAL EXHIBITS**

CHEVRON CORP. V. DONZIGER, ET AL.
11-cv-0691 (LAK)

DX Number Order

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1	04/1994	Report Re Rights Violations in the Ecuadorian Amazon, <i>The Human Consequences of Oil Development</i> by The Center for Economic & Social Rights	LAP 0000595 – LAP0000665		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
2	4/7/2000	Affidavit of Dr. Jose Maria Perez-Arteta	LAP0000554 – LAP0000565		Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
3	4/20/2000	Certificate of Accuaracy of Fabio Friscia by Spanish Accredited Bureau of Translations & Interpreters Re of <i>Exhibit I to the affidavit of Dr. Jose Maria Perez Arteta</i>	LAP0000566		Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
4	05/2007	Vanity Fair Magazine Article Re Big Oil Jungle Law by William Langewiesche	LAP0000448-LAP0000471		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
5		INTENTIONALLY LEFT BLANK			[Withdrawn]
6	5/24/2005	Ltr of approval from Superintendencia de Companias	LAP0000569		Incomplete or No Translation Provided; Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

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7	6/24/2005	Ltr from Interintelg S.A. naming Marino Fernandez president of the company.	LAP0000567 –LAP0000568		Incomplete or No Translation Provided; Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
8	6/24/2005	Ltr from Interintelg S.A. naming Diego Fernando Borja Sanchez General Manager of the company	LAP0000570		Incomplete or No Translation Provided; Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
9		INTENTIONALLY LEFT BLANK			[Withdrawn]
10	12/8/2005	Ltr from the Ministry of National Defence to Julio Gonzalez	LAP0000721 – LAP0000722		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
11	11/7/2005	Ltr from the national Congress of Ecuador(Congreso Nacional)to Oswaldo Jarrin	LAP0000719 – LAP0000720		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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12		INTENTIONALLY LEFT BLANK			[Withdrawn]
13	3/10/2006	Report by Dr. Ann Maest Mark Quarles & William Powers Re How Chevron's sampling & analysis methods minimizes evidence of contamination	LAP0000481 - LAP0000489		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
14	3/15/2006	Chain of Custody Record by Severn Trent Laboratories	LAP0000004 – LAP0000007		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
15	4/5/2006	Report by Bill Powers, P.E. & Mark Quarles Re Texaco's waste management practices in Ecuador were illegal & violated industry standards	LAP0000505 – LAP0000514		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
16	7/15/2007	Investigation Summary Re Summary of activities Phase II – Global Environmental Audit	BJORKMAN00053842 – BJORKMAN00053882		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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17	8/26/2007	Summary of activities & samples collected: Phase II – Global Environmental Audit Shadow Team	BJORKMAN00051432 – BJORKMAN00051446		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
18		INTENTIONALLY LEFT BLANK			[Withdrawn]
19	2/11/2008	Ltr from Lisa B. Barry (Chevron) to the Honorable Susan Schwab Re petition for withdrawal	CVX-RICO-2308838 - 2308843		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
20	9/15/2008	Filing by Adolfo Callejas re: Expert report by Richard Cabrera Vega	CVX-RICO – 9005140 – 9005251		Waste of Time, Unfair Delay, Cumulative (FRE 403)
21	9/15/2008	Appeal by Adolfo Callejas re: Richard Cabrera Vega	CVX – RICO – 2309761– CVX – RICO - 2309776		Waste of Time, Unfair Delay, Cumulative (FRE 403)
22	4/27/2009	Randal Revision of short script	CVX – RICO – 4765854 – 4765858		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
23	11/21/2008	Email from Donziger to Beltman, November 21, 2008; Subject: read pp17-18 of attached and call me	CVX-RICO2223241		Inadmissible Hearsay (FRE 801/802/805)
24	3/26/2009	Email from William T. Irwin to Chris Gidez Re Response language for Crude email chain	CVX-RICO-4875276 – CVX-RICO-4875279	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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25	4/30/2009	Email from Gene Randall to Kent S. Robertson Re Randal revision	CVX – RICO - 4765853		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
26	05/2009	Report Re The true cost of Chevron by An Alternative annual report	LAP0001128 – LAP0001175		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
27		INTENTIONALLY LEFT BLANK			[Withdrawn]
28		INTENTIONALLY LEFT BLANK			[Withdrawn]
29		INTENTIONALLY LEFT BLANK			[Withdrawn]
30	8/31/2009	Chevron Press Release “Videos Reveal Serious Judicial Misconduct & Political Influence in Ecuador lawsuit”	www.chevron.com/news/press/release/?id=2009-08-31 (3 pages)		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
31	8/31/2009	Ltr from T. Cullen (Jones Day) to Dr. Washington Pesantez Munoz	Ex E: Letter from T Cullen to W Pesantez; 3 pages		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26)

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32	10/1/2009	Transcript 1 – Recorded conversation between Diego Borja & Santiago Escobar	LAP 00000 72 LAP0000088		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
33	10/1/2009	Transcript 2 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000089 – LAP0000104		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
34	10/1/2009	Transcript 3 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000105 – LAP0000119		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
35	10/1/2009	Transcript 4 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000120 – LAP0000135		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)

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36	10/1/2009	Transcript 5 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000136 – LAP0000148		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
37	10/1/2009	Transcript 6 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000149 – LAP0000163		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
38	10/1/2009	Transcript 7 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000164 – LAP0000178		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
39	10/1/2009	Transcript 8 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000179 – LAP0000192		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)

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40	10/1/2009	Transcript 9 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000193 – LAP0000194		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
41	10/1/2009	Transcript 10 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000195 – LAP0000212		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
42	10/1/2009	Transcript 11 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000213 – LAP0000226		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
43	10/1/2009	Transcript 12 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000227 – LAP0000236		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)

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44	10/1/2009	Transcript 13 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000237 – LAP0000238		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
45	10/1/2009	Transcript 14 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000239		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
46	10/1/2009	Transcript 15 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000240 – LAP0000241		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
47	10/1/2009	Transcript 16 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000242 – LAP0000243		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)

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48	10/1/2009	Transcript 17 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000244 – LAP0000245		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
49	10/1/2009	Transcript 18 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000246 – LAP0000257		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
50	10/1/2009	Transcript 19 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000258 – LAP0000269		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
51	10/5/2009	Transcript 20 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000270 – LAP0000280		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)

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52	10/7/2009	Transcript 21 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000281 – LAP0000293		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
53	10/7/2009	Transcript 22 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000294 – LAP0000305		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
54	10/13/2009	Transcript 23 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000306 – LAP0000314		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
55	10/15/2009	Transcript 24 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000315 – LAP0000365		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)

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56	10/18/2009	Transcript 25 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000366 – LAP0000403		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
57	10/31/2009	Transcript 26 – Recorded conversation between Diego Borja & Santiago Escobar	LAP0000404 – LAP0000443		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
58		INTENTIONALLY LEFT BLANK			[Withdrawn]
59	10/26/2009	Ltr from T. Cullen (Jones Day) to Dr. Diego Garcia Carrion Re request for information	CASE 2:13-CV-03926 DKT 21-14		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26)
60		INTENTIONALLY LEFT BLANK			[Withdrawn]
61	4/5/2010	Report of Investigation by Grant W. Fine, Esq. Re recorded conversations & 25 pgs. Of printouts of on-line chats between Diego Borja & Santiago Escobar	LAP0000008 – LAP0000015		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)

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62	4/5/2010	Informe de Investigacion por Grant W. Fine, Esq. Re conversaciones grabadas y 25 paginas de copias impresas de los chats en linea entre Diego Borja y Santiago Escobar.	LAP0000026 – LAP0000034		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
63	5/25/2010	Email from Kent S. Robertson to Jim Craig Re Info	CVX – RICO – 4755869		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
64		INTENTIONALLY LEFT BLANK			[Withdrawn]
65	8/10/2010	Email from Dave A. Samson to Rhonda Zygocki Re Chevron & Ecuador email chain	CVX-RICO-4788388 – CVX-RICO-4788391		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
66	1/5/2011	Email from Dave Samson to Rhonda Zygocki Re GQ Magazine	CVX-RICO-4937254		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26)
67	1/13/2011	Email from Lloyd F. Avram to Justin L. Higgs Re answer for JSW town hall email chain	CVX-RICO-4702893- CVX-RICIO-4702895		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
68	8/1/2011	Expert report of professor Joseph L. Staats	LAP0000825 – LAP0000853		Improper expert opinion (FRCP 26); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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69	9/9/2011	Pleading by Adolpho Callejas (Exhibit 1E deposition)	Doc 204 Case 11-1150 pgs. 169-178		Relevance – unclean hands defense regarding alleged procedural misconduct in the Lago Agrio Litigation (Count 9 Action, DI 348 at 24 n.69; Relevance – unclean hands defense regarding alleged procedural misconduct in the Lago Agrio Litigation (Count 9 Action, DI 348 at 24 n.69, Trial Tr. at 715:17-22); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Incomplete or Inaccurate Description or Document
70	9/9/2011	Pleading by Adolpho Callejas Exhibit 1S deposition	Doc 204 Case 11-1150 pgs. 179-187		Relevance – unclean hands defense regarding alleged procedural misconduct in the Lago Agrio Litigation (Count 9 Action, DI 348 at 24 n.69; Relevance – unclean hands defense regarding alleged procedural misconduct in the Lago Agrio Litigation (Count 9 Action, DI 348 at 24 n.69, Trial Tr. at 715:17-22); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Incomplete or Inaccurate Description or Document
71	9/9/2011	Pleading by Adolpho Callejas Exhibit 2E deposition	Doc 204 Case 11-1150 pgs. 189-204		Incomplete or No Translation Provided; Relevance – unclean hands defense regarding alleged procedural misconduct in the Lago Agrio Litigation (Count 9 Action, DI 348 at 24 n.69; Relevance – unclean hands defense regarding alleged procedural misconduct in the Lago Agrio Litigation (Count 9 Action, DI 348 at 24 n.69, Trial Tr. at 715:17-22); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Incomplete or Inaccurate Description or Document

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
72		INTENTIONALLY LEFT BLANK			[Withdrawn]
73	1/16/2012	Diary of Alberto Guerra	CVX-RICO-5912600 – CVX-RICO-5912777	X	No Objections
74	2/6/2012	Ltr from Steven R. Donziger to Harold Hongiu Koh Re Chevron trying to evade paying the judgment	LAP0000723 – LAP0000733		Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
75	2/10/2012	Ltr to Secretary-General Ban Ki-Moon from Enrique Bemales Ballesteros Re explain how Chevron's efforts to distort the BIT system to interfere with the rights of dozens of indigenous & farmer communities	LAP0000854 – LAP0000857		Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
76	3/1/2012	Report from Doug Cassel Re Open letter to the human rights community on the Ecuadorian judgment against Chevron	LAP0000744 – LAP0000751		No Objections
77		INTENTIONALLY LEFT BLANK			[Withdrawn]
78	10/23/2012	Ltr from Richard DeSanti (Chevron) to Erin Madden (Portland Harbor Trustee Council) Re Stratus & Portland Harbor Superfund Site	Case 1:11-cv-00691 LAK-JCF Dkt 768-2		No Objections
79	10/23/2012	Resolution from Johana Pesantez Benitez Acuerdo 0476	LAP 0001461 – LAP 0001463		Incomplete or No Translation Provided; Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
80	11/5/2012	Ltr from Richard DeSanti (Chevron) to Erin Madden (Portland Harbor Trustee Council) Re Stratus & Superfund Site	Dkt 768-3 Case 1:11-cv-00691 LAK		No Objections
81	11/12/2012	Ltr from Richard DeSanti (Chevron) to Erin Madden (Portland Harbor Trustee Council) Re Stratus & Portland Harbor Superfund Site	Dkt 694-6 Case 1:11-cv-00691 LAK		No Objections
82	11/24/2012	Agreement between Humberto Piaguaje Lucitante & Mariana Jimenez Abad	LAP0001464	X	Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
83	11/29/2012	Ltr from Richard DeSanti (Chevron) to Erin Madden (Portland Harbor Trustee Council) Re Stratus & Portland Harbor Superfund	Dkt 768-6 Case 1:11-cv-00691 LAK		No Objections
84	1/18/2013	Transcripts of an Audio conversation between Nicolas Zambrano & Andres Rivero	LAP0001434 – LAP0001436		No Objections
85	1/18/2013	Audio conversation between Nicolas Zambrano & Andres Rivero	LAP0001450 DKT.974 AUDIO ON CD		No Objections
86	1/27/2013	Agreement between Chevron and Alberto Guerra Batista	CVX-RICO-0509653-CVX-RICO-0509663		No Objections

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
87	2/13/2013	Ltr from Dr. Wilson Javier Falcon Rodriguez to Humberto Javier Piaguaje Lucitante Re Policy registry (registro de Directiva	LAP0001468		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
88	2/26/2013	Emails from Jarod Stewart to Juan Pablo Alban Re Expert Opinion	LAP0001457 – LAP0001460		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
89	2/27/2013	Emails from Jarod Stewart to Raul Rosero Re reporting requirements	LAP0001452 – LAP0001456		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
90	3/22/2013	Settlement Agreement & Mutual release filed by Chevron & the Stratus Parties	CASE 1:11-CV-00691-LAK-JCF Dkt 934-1		No Objections
91		INTENTIONALLY LEFT BLANK			[Withdrawn]
92	3/28/2013	Declaration of Judge Nicolas Zambrano	DKT 974-1 Case 1:11-cv-00691 LAK		No objections, so long as not offered for the truth of the matter asserted
93		INTENTIONALLY LEFT BLANK			[Withdrawn]
94		INTENTIONALLY LEFT BLANK			[Withdrawn]
95	4/24/2013	Witness Andres Rivero Exhibit 8 #1 Ltr to the office of the prosecutor of the republic Re indictment order	Doc36-23 Case 1:11 – cv 00691-LAK		Waste of Time, Unfair Delay, Cumulative (FRE 403)
96	1/22/2013	Witness Andres Rivero Re Declaration #2	Doc 746-14 Case 1:11 – cv – 00691 – LAK		Waste of Time, Unfair Delay, Cumulative (FRE 403)
97		INTENTIONALLY LEFT BLANK			[Withdrawn]

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
98	1/27/2013	Witness Andres Rivero Re Agreement Exhibit 3268 (Guerra agreement)	Doc 755-14 – Case 1:11 – cv – 00691-LAK CVX-RICO-0509653-0509663		Incomplete or Inaccurate Description or Document
99	5/10/2013	Witness Adolfo Callejas Ribadeneira Affidavit	Doc 746-10 Case 1:11 – cv – 00691 LAK		No Objections
100	12/1/1995	Witness Adolfo Callejas Ribadeneira Exhibit 6	Doc 152-6 Case 1:11 – cv – 00691 LAK		Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
101	12/16/2009	Witness Adolfo Callejas Ribadeneira Agreement Exhibit 6 # 17	CVX – RICO – 0512123		No Objections
102	12/7/2012	Witness Adolfo Callejas Ribadeneira Authorization Exhibit 6 #18	CVX – RICO – 0512124		No Objections
103	9/27/2010	Witness Adolfo Callejas Ribadeneira Declaration of Donald Rafael Moncayo Jimenez Exhibit 6 # 19	CVX – RICO – 2495010– CVX – RICO - 2495014		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Authentication (FRE 901/902)
104	2/3/2006	Reis-Vega Exhibit 4 Ltr Ministry of National Defense filing	Doc 152-31, pages 1-16		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
105	7/26/2013	Declaration of Erwin Chemerinsky	LAP0001469 – LAP00001471		Improper expert opinion (FRCP 26); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
106		INTENTIONALLY LEFT BLANK			[Withdrawn]
107		INTENTIONALLY LEFT BLANK			[Withdrawn]

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
108		INTENTIONALLY LEFT BLANK			[Withdrawn]
109	Undated	Bylaws from Justice of Ministry Human rights & cult	LAP00001472 – LAP00001487		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
110		INTENTIONALLY LEFT BLANK			[Withdrawn]
111		INTENTIONALLY LEFT BLANK			[Withdrawn]
112		INTENTIONALLY LEFT BLANK			[Withdrawn]
113		INTENTIONALLY LEFT BLANK			[Withdrawn]
114	Undated	Transcripts of an audio conversation between Dr. Efrain Mendoza, Nicolas Zambrano & Liliana Suarez	LAP0001437 – LAP0001449		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
115	Undated	Audio conversation between Dr. Efrain Mendoza, Nicolas Zambrano & Liliana Suarez	LAP0001451		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
116	Undated	List of photos from Texaco's oil concession areas in the Ecuadoran Amazon by Lou Dematteis	LAP00000001 – LAP00000003		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
117	Undated	Photographs	LAP0000035 – LAP0000040		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Incomplete or Inaccurate Description or Document
118	Undated	Message log of Diego & Canada	LAP0000041 – LAP0000071		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Illegible Document (FRE 1003)
119	Undated	Online article of Expert Richard Cabrera Re Violates Legal Process in Lago Agrio	CVX – RICO – 4718136 – 4718137		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Incomplete or Inaccurate Description or Document
120	Undated	Ecuador Technical Update for Chuck Taylor	CVX – RICO – 5052876 – 5052878		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
121	Undated	Article Re When is a trial not a trial?	CVX – RICO - 5075903		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
122	Undated	Article – Draft press release Re Ecuador lawsuit report fabricated evidence, tainted by political pressure	CVX – RICO – 4908640 – 4908643	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
123	Undated	Report – Scope of remediation	CVX – RICO – 5052879 – 5052933		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
124	7/10/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002-2003	LAP0001488		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
125	7/11/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002-2003	LAP0001489		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
126	7/12/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002-2003	LAP0001490		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
127	7/12/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002-2003	LAP0001491 – LAP0001492		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
128	7/12/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002-2003	LAP0001493 – LAP0001494		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
129	7/23/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001495		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
130	7/23/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001496		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
131	7/23/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001497 – LAP0001498		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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132	7/25/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001499		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
133	7/27/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001500		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
134	7/27/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001501 – LAP0001502		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
135	7/27/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001503		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
136	7/30/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001504 – LAP0001505		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
137	7/30/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001506		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
138	7/31/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001507		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
139	8/16/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001508		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
140	8/17/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001509		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
141	8/17/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001510		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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142	8/17/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001511		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
143	8/17/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001512		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
144	8/17/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001513		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
145	8/17/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001514		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
146	8/17/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001515		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
147	8/17/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001516		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
148	8/20/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001517		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
149	8/21/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001518		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
150	8/23/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001519		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
151	8/23/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001520		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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152	8/27/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001521		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
153	8/31/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001522		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
154		INTENTIONALLY LEFT BLANK			[Withdrawn]
155	8/31/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001524		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
156	9/3/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LA+D214P0001525 – LAP0001526		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
157	9/4/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001527		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
158	9/5/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001528		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
159	9/7/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001529		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
160	9/10/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001530		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
161	9/12/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001531		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
162	9/14/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001532		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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163	9/18/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001533		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
164	9/21/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001534		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
165	9/24/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001535		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
166	9/25/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001536		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
167	9/26/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001537		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
168	9/27/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001538		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
169	9/27/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001539		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
170	9/27/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001541		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
171	10/8/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001540		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
172	10/8/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001542 – LAP0001544		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
173	10/11/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001545		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
174	10/11/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001546 – LAP0001548		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
175	10/15/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001549		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
176	10/3/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001550		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
177	10/3/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001551		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
178	10/29/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001552		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
179	10/29/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001553 – LAP0001554		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
180	10/30/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001555 – LAP0001556		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
181	10/31/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001557		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
182	11/1/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001558		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
183	11/5/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001559 – LAP0001561		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
184	11/6/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001562 – LAP0001563		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
185	11/8/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001564		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
186	11/14/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001565		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
187	11/14/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001566		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
188	11/19/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001567		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
189	11/27/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001568		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
190	12/5/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001569		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
191	12/7/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001570		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
192	12/7/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001571 – LAP0001572		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
193	12/7/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001573 – LAP0001574		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
194	12/10/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001575		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
195	12/12/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001576		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
196	12/14/2007	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001577		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
197	1/7/2008	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001578		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
198	1/28/2008	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001579		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
199	3/19/2008	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001580		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
200	4/1/2008	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001581		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
201	4/28/2008	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001582 – LAP0001583		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
202	4/25/2008	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001584 – LAP0001585		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
203	6/11/2008	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001586		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
204	9/15/2008	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001587		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
205	9/15/2008	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001588 – LAP0001589		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
206	10/7/2008	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001590 – LAP0001595		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
207	10/15/2008	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001596		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
208	10/20/2008	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001597 – LAP0001598		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
209	11/7/2008	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001599 – LAP0001600		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
210	11/17/2008	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001601		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
211	12/8/2008	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001602 – LAP0001603		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
212	12/15/2008	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001604		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
213	1/7/2009	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001605		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
214	1/22/2009	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001606		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
215	3/4/2009	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001607 – LAP0001616		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
216		INTENTIONALLY LEFT BLANK			[Withdrawn]
217	3/22/2010	Ltr filed by Richard Cabrera in <i>Aguinda v. Chevron</i> , Case No. 002	LAP0001618 – LAP0001620		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
218	3/27/2013	Ministerio de Bienestar Social (social welfare ministry) Re Frente de defensa de la amazonia	LAP0001621 – LAP0001622		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
219	3/2/2007	Reunion ordinaria del comite ejecutivo del caso Texaco	LAP0001623		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
220	12/5/2011	Reunion ordinaria del comite ejecutivo de la sociedad de hecho asamblea de afectados y afectadas por Texaco	LAP0001624		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
221	3/7/2011	Reunion ordinaria del comite ejecutivo de la sociedad de hecho asamblea de afectados y afectadas por Texaco	LAP0001625 – LAP0001626		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
222	6/7/2010	Reunion ordinaria del comite ejecutivo de la sociedad de hecho asamblea de afectados y afectadas por Texaco	LAP0001627		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
223	8/8/2011	Reunion ordinaria del comite ejecutivo de la sociedad de hecho asamblea de afectados y afectadas por Texaco	LAP0001628 – LAP0001629		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
224	1/9/2012	Reunion ordinaria del comite ejecutivo de la sociedad de hecho asamblea de afectados y afectadas por Texaco	LAP0001630 – LAP0001631		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
225	3/9/2009	Reunion ordinaria del comite ejecutivo del asamblea de afectados por Texaco	LAP0001632		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
226	10/9/2006	Acta de la asamblea ordinaria del comite ejecutivo del caso Texaco	LAP0001633		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
227	3/10/2012	Reunion ordinaria del comite ejecutivo de la sociedad de hecho asamblea de afectados y afectadas por Texaco ADAT	LAP0001634 – LAP0001637		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
228	10/13/2008	Reunion ordinaria del comite ejecutivo de la sociedad de hecho asamblea de afectados por Texaco	LAP0001638		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
229	4/15/2011	Reunion ordinaria del comite ejecutivo de la sociedad de hecho asamblea de afectados por Texaco	LAP0001639		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
230	11/17/2006	Acta de la asamblea ordinaria del comite ejecutivo del caso Texaco	LAP0001640		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
231	2/18/2011	Reunion ordinaria de la asamblea general de delgados y delegadas	LAP0001641 – LAP0001643		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
232	8/18/2008	Reunion ordinaria del comite ejecutivo de la asamblea de afectados por Texaco	LAP0001644 –LAP0001645		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
233	4/19/2010	Reunion extraordinaria del comite ejecutivo de la asamblea de afectados por Texaco	LAP0001646 – LAP0001647		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
234	3/21/2011	Reunion ordinaria del comite ejecutivo de la sociedad de hecho asamblea de afectados y afectadas por Texaco	LAP0001648 – LAP0001649		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
235	8/23/2008	Reunion ordinaria de la asamblea de afectados por Texaco	LAP0001650 – LAP0001651		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
236	6/27/2011	Reunion ordinaria del comite ejecutivode la sociedad de hecho asamblea de afectados y afectadas por Texaco	LAP0001652 – LAP0001653		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
237	1/27/2012	Reunion ordinaria de la sociedad de hecho asamblea de afectados y afectadas por Texaco	LAP0001654		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
238	4/29/2011	Reunion ordinaria de la asamblea general de delegados y delegadas	LAP0001655 – LAP0001656		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
239	7/30/2011	Reunion ordinaria de la sociedad de hecho asamblea de afectados y afectadas por Texaco	LAP0001657 – LAP0001659		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
240	10/30/2010	Reunion ordinaria de la asamblea de afectados por Texaco	LAP0001660 – LAP0001662		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
241	11/28/2009	Reunion ordinaria de la asamblea de afectados por Texaco	LAP0001663 – LAP0001664		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
242	12/8/2006	Resoluciones de la reunion ordinaria de las asamblea de delegados de los afectados por las operaciones petroleras de Texaco	LAP0001665		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
243	3/1/2010	Reunion extraordinaria del comite ejecutivo de la samblea de afectados por Texaco	LAP0001666		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
244	4/19/2010	Reunion extraordinaria del comite ejecutivo de la asamblea de afectados por Texaco	LAP0001667 – LAP0001668		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
245	5/7/2010	Reunion ordinaria del comite ejecutivo de la asamblea de afectados por Texaco	LAP0001669		Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
246	1/15/2013	Reunion ordinaria del comite ejecutivo de la udapt	LAP0001670 – LAP0001676		Excludable subject to DI 1529 at 103-04; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
247		INTENTIONALLY LEFT BLANK			[Withdrawn]
248		INTENTIONALLY LEFT BLANK			[Withdrawn]
249		Pre-inspection video 050113 Shushufindi10+13	LAP0000671		Excluded per Court Order (Trial Tr. at 497:3-12); Privileged/Work Product; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
250		INTENTIONALLY LEFT BLANK			[Withdrawn]

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
251		INTENTIONALLY LEFT BLANK			[Withdrawn]
252		INTENTIONALLY LEFT BLANK			[Withdrawn]
253		INTENTIONALLY LEFT BLANK			[Withdrawn]
254		INTENTIONALLY LEFT BLANK			[Withdrawn]
255		INTENTIONALLY LEFT BLANK			[Withdrawn]
256		INTENTIONALLY LEFT BLANK			[Withdrawn]
257		Pre-inspection video 050120 Shushufindi45A	LAP0000679		Excluded per Court Order (Trial Tr. at 497:3-12); Privileged/Work Product; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
258		INTENTIONALLY LEFT BLANK			[Withdrawn]
259		INTENTIONALLY LEFT BLANK			[Withdrawn]
260		Pre-inspection video 050303 Shushufindi21	LAP0000682		Excluded per Court Order (Trial Tr. at 497:3-12); Privileged/Work Product; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
261		INTENTIONALLY LEFT BLANK			[Withdrawn]
262		INTENTIONALLY LEFT BLANK			[Withdrawn]
263		Pre-inspection video 050411SachaNorte1	LAP0000685		Excluded per Court Order (Trial Tr. at 497:3-12); Privileged/Work Product; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
264		Pre-inspection video 050812+13Shushufindi18	LAP0000686		Excluded per Court Order (Trial Tr. at 497:3-12); Privileged/Work Product; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
265		INTENTIONALLY LEFT BLANK			[Withdrawn]
266		INTENTIONALLY LEFT BLANK			[Withdrawn]
267		INTENTIONALLY LEFT BLANK			[Withdrawn]

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
268		Pre-inspection video 051002 LagoAgrio6	LAP0000690		Excluded per Court Order (Trial Tr. at 497:3-12); Privileged/Work Product; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
269		INTENTIONALLY LEFT BLANK			[Withdrawn]
270		INTENTIONALLY LEFT BLANK			[Withdrawn]
271		Pre-inspection video 051103 Sacha19	LAP0000693		Excluded per Court Order (Trial Tr. at 497:3-12); Privileged/Work Product; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
272		INTENTIONALLY LEFT BLANK			[Withdrawn]
273		INTENTIONALLY LEFT BLANK			[Withdrawn]
274		INTENTIONALLY LEFT BLANK			[Withdrawn]
275		INTENTIONALLY LEFT BLANK			[Withdrawn]
276		INTENTIONALLY LEFT BLANK			[Withdrawn]
277		INTENTIONALLY LEFT BLANK			[Withdrawn]

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
278		INTENTIONALLY LEFT BLANK			[Withdrawn]
279		INTENTIONALLY LEFT BLANK			[Withdrawn]
280		INTENTIONALLY LEFT BLANK			[Withdrawn]
281		INTENTIONALLY LEFT BLANK			[Withdrawn]
282		INTENTIONALLY LEFT BLANK			[Withdrawn]
283		INTENTIONALLY LEFT BLANK			[Withdrawn]
284		INTENTIONALLY LEFT BLANK			[Withdrawn]
285		INTENTIONALLY LEFT BLANK			[Withdrawn]
286		INTENTIONALLY LEFT BLANK			[Withdrawn]
287		INTENTIONALLY LEFT BLANK			[Withdrawn]
288		INTENTIONALLY LEFT BLANK			[Withdrawn]
289		INTENTIONALLY LEFT BLANK			[Withdrawn]
290		INTENTIONALLY LEFT BLANK			[Withdrawn]
291		INTENTIONALLY LEFT BLANK			[Withdrawn]
292		INTENTIONALLY LEFT BLANK			[Withdrawn]
293		INTENTIONALLY LEFT BLANK			[Withdrawn]

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
294		INTENTIONALLY LEFT BLANK			[Withdrawn]
295		INTENTIONALLY LEFT BLANK			[Withdrawn]
296		INTENTIONALLY LEFT BLANK			[Withdrawn]
297	10/19/2005	Frente press release	LAP0001677 – LAP0001678		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
298	10/21/2005	CONAIE press release	LAP0001679		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
299	Oct/Nov 2005	Breve Resumen	LAP0001680 – LAP0001682		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
300	4/2/2007	Filing with Ministerio fiscal distrital de Pichincha	LAP0001683		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
301	11/7/2005	Filing by Alejandro Ponce with Fiscalia distrital de Pichincha	LAP0001684 – LAP0001685		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
302	11/10/2005	Filing by Ermel Chavez with Senor Fiscal Distrital de la Provincia de Sucumbios	LAP0001686 – LAP0001687		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
303	11/10/2005	Filing by Pablo Fajardo with Senor Fiscal Distrital de la Provincia de Sucumbios	LAP0001688 – LAP0001689		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
304	4/18/2012	Letter from Francisco Albuja to Julio Prieto of Envio de fotografias	LAP0001690		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
305	10/18/2005	Filing by Adolfo Callejas with Corte Superior de Justicia de Nueva Loja	LAP0001691		No objections, so long as not offered for the truth of the matter asserted
306	12/1/1995	Affidavit of Dr. Adolfo Callejas	Dkt 152-6		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
307	10/18/2005	Filing by Arturo Velasco	LAP0001694		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
308	2/23/2006	Letter from Yanza, Fajardo, Ponce, and Donziger to International Commission of Jurists & Asociacion Ecuatoriana de Juristas	LAP0001695 – LAP0001701		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
309	5/16/2006	UA Heredia fear for safety	LAP0001702 – LAP0001703		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
310	9/20/2007	Letter to Salim Zaidan from Heredia, Fajardo, Prieto, Yanza	LAP0001704 – LAP0001705		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
311	2/24/2006	Filing by Alejandro Ponce with Procurador General	LAP0001706		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
312		INTENTIONALLY LEFT BLANK			[Withdrawn]
313	5/20/2010	Filing by Pablo Fajardo to Ministro de Justicia y Derechos Humanos Jose Serrano	LAP0001712		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
314	3/20/2012	Filing by Julio Prieto to Amparo Esparza	LAP0001713		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
315	10/20/2005	Filing by Dr. Alberto Wray with the Presidencia de la Corte Superior de Justicia de Nueva Loja	LAP0001714		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
316	11/3/2006	Further information on UA and follow-up, re: Heredia fear for safety	LAP0001715 – LAP0001716		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
317	11/8/2005	CEJIL and Amazon Watch letter to Doctor Canton	LAP0001717 – LAP0001726		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
318	10/29/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re copia integra certificada	LAP0001727 – LAP0001730		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
319	10/22/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re investigacion por Pallares y Yopez	LAP0001731 – LAP0001733		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
320	10/23/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re Lydia Beebe and Anexes four and six	LAP0001734 – LAP0001735		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
321	10/23/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re Rene Vargas Pazos	LAP0001736 – LAP0001737		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
322	10/24/2003	Filing by Alberto Wray Aguinda v. Chevron case no. 002 re David Russell	LAP0001738		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
323	10/24/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re Cristobal Bonifaz	LAP0001739		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
324	10/24/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 Daniel J. King	LAP0001740		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
325	10/24/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re Roseann B. Mackechnie	LAP0001741		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
326		INTENTIONALLY LEFT BLANK			[Withdrawn]

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
327	10/24/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re 2002 and 2003 Annual Meeting and Proxy Statements	LAP0001742		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
328	10/24/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re Chevron Texaco Merger	LAP0001743		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
329	10/24/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re Actas de las Sesiones del Directorio de Texaco	LAP0001744		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
330	10/27/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re Segundo Ojeda	LAP0001745		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
331	10/27/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re Alejandro Soto	LAP0001746 – LAP0001747		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
332	10/27/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 Luis Bermeo	LAP0001748 – LAP0001749		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
333	10/28/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re Instituto de Epidemiologia y Salud Comunitaria	LAP0001750 – LAP0001751		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
334	10/28/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 Jose Betancourt	LAP0001752		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
335	10/28/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re depositions of Texaco executives and employees	LAP0001754 – LAP0001763		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
336	10/28/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re la revista “American Way”	LAP0001753		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
337	10/28/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re 120 fojas	LAP0001764 – LAP0001767		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
338	10/29/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re Manuel Navarro	LAP0001768 – LAP0001769		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
339	10/29/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re Lousiana Office of the State Register	LAP0001770 – LAP0001771		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
340		INTENTIONALLY LEFT BLANK			[Withdrawn]
341	10/29/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re inspecciones judiciales	LAP0001772 – LAP0001777		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
342	10/29/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re inspecciones judiciales	LAP0001778 – LAP0001781		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
343	10/24/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re Rene Bucaram y D.W. Archer	LAP0001782		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
344		INTENTIONALLY LEFT BLANK			[Withdrawn]
345		INTENTIONALLY LEFT BLANK			[Withdrawn]
346	10/24/2003	Filing by Alberto Wray in Aguinda v. Chevron case no. 002 re Jose Betancourt	LAP0001783		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
347	10/24/2003	Filing by Adolfo Callejas in Aguinda v. Chevron case no. 002 re Pablo Yopez y Roberto Bejarano	LAP0001784 – LAP0001785		Incomplete or No Translation Provided; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26)
348	10/29/2003	Filing by Adolfo Callejas in Aguinda v. Chevron case no. 002 re Superintendente de Companias	LAP0001786 – LAP0001835		Incomplete or No Translation Provided; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26)
349		INTENTIONALLY LEFT BLANK			[Withdrawn]
350	10/24/2003	Filing by Adolfo Callejas in Aguinda v. Chevron case no. 002 re Pablo Yopez y Roberto Bejarano	LAP0001837 – LAP0001838		Incomplete or No Translation Provided; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26)
351	10/29/2003	Filing by Adolfo Callejas in Aguinda v. Chevron case no. 002 re PetroProduction	LAP0001839 – LAP0001847		Incomplete or No Translation Provided. No other objections, so long as not offered for the truth of the matter asserted.
352	10/29/2003	Filing by Adolfo Callejas in Aguinda v. Chevron case no. 002 re Eduardo Ortega	LAP0001848 – LAP0001854		Incomplete or No Translation Provided; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26)
353	10/29/2003	Filing by Adolfo Callejas in Aguinda v. Chevron case no. 002 re Jose Varea	LAP0001855 – LAP0001856		Incomplete or No Translation Provided; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26)
354	10/29/2003	Filing by Adolfo Callejas in Aguinda v. Chevron case no. 002 re Roy Dale Roberts	LAP0001857 – LAP0001862		Incomplete or No Translation Provided; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
355	10/29/2003	Filing by Adolfo Callejas in Aguinda v. Chevron case no. 002 re John Brix Gustavson	LAP0001863 – LAP0001868		Incomplete or No Translation Provided; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26)
356		INTENTIONALLY LEFT BLANK			[Withdrawn]
357		INTENTIONALLY LEFT BLANK			[Withdrawn]
358	10/1/2009	Transcript of recorded conversation between Diego Borja & Santiago Escobar	Dkt. 152-2		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
359	9/10/2010	Memorandum for the issuance of a subpoena to Digeo Borja for a deposition and production of documents	Dkt. 152-3		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Not Evidence
360	7/17/1972	Reporting of Environmental Incidents New Instructions	Dkt. 152-4		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
361	12/1/1995	Affidavit of Dr. Rodrigo Perez Pallares	Dkt. 152-5		Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
362	12/1/1995	Affidavit of Dr. Adolfo Callejas	Dkt.152-6		Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
363	2/4/2000	Affidavit of Enrique Ponce Y Carbo	Dkt. 152-7		Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
364	2/9/2000	Affidavit of Dr. Alejandro Ponce Martinez	Dkt. 152-8		Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
365	2/7/2000	Affidavit of Dr. Sebastian Perez-Arteta	Dkt. 152-9		Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
366	2/4/2000	Affidavit of Rodrigo Perez Pallares	Dkt. 152-10		Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
367	2/4/2000	Affidavit of Dr. Adolfo Callejas Ribadeneira	Dkt. 152-11		Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
368	4/4/2000	Supplemental Affidavit of Dr. Alejandro Ponce Martinez	Dkt. 152-12		Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
369	3/30/2000	Sworn statement of Dr. Ricardo Vaca Andrade	Dkt. 152-13		Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
370	2001	Transparency International Corruption Perceptions Index 2001	Dkt. 152-14		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
371	2010	Transparency International Corruption Perceptions Index 2010	Dkt. 152 -15 -- 152-18		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
372	11/1/2000	Ecuador Country Commercial Guide by Robert O. Jones	Dkt. 152-19		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
373	Mar-10	U.S. Department of State – 2010 Investment Climate Statement - Ecuador	Dkt. 152-20		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
374	2/2/2006	Letter to Ambassador Portman from Barack Obama and Patrick Leahy	Dkt. 152-21		Relevance (FRE 401/402)
375	7/26/2008	Newsweek article - A \$16 Billion Problem by Michael Isikoff	Dkt. 152-22		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
376	12/6/1993	Fax from Federal Government Affairs-Texaco to Ricardo Veiga and others Re: draft letter to State Department	Dkt. 152-23		Objection sustained both as to relevance and 403. (Trial Tr. 92:5-95:2)
377	12/3/1993	Embajada del Ecuador - Washington, D.C.	Dkt. 152-24		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
378	11/8/2006	Excerpt of deposition transcript of Ricardo Reis Veiga	Dkt. 152-25		Violates pretrial order re: proper format for deposition designations (Judge Kaplan Individual Rules and Practices at 8); Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
379	1/18/1994	Holwill & Company memo for Ricardo Veiga	Dkt. 152-26		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
380	8/17/1993	Holwill & Company memo to the files re Conversation with VP Alberto Dahik	Dkt. 152-27		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
381	8/17/1993	Holwill & Company memo to the files re Conversation with Minister of Energy Francisco Acosta	Dkt. 152-28		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
382	2/28/2000	Sworn Affidavit of Dr. Jaime Espinosa Ramirez	Dkt. 152-29		Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
383	3/16/2004	Agreement of Inter-Institutional Cooperation Between the Texaco Petroleum Company and the Fourth Army Division “Amazonas”	Dkt. 152-30		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
384	2/3/2006	The Ministry of National Defense-Official Communication	Dkt. 152-31		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
385	12/22/2005	Letter from Centro por la Justicia y el Derecho Internacional to Alejandro Ponce Villacis and others, signed by Santiago A. Canton	Dkt. 152-32		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
386	11/17/2005	Letter from Hina Jilani to Antonio Parra Gil	Dkt. 152-33		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
387	11/5/2003	Filing by Chevron with Superior Court of Justice, Nueva Loja in Spanish with relevant portions translated to English	Dkt. 152-34		Incomplete or No Translation Provided; Rule of Completeness (FRE 106); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
388	11/5/2003	Filing by Chevron with Superior Court of Justice, Nueva Loja in Spanish with relevant portions translated to English	Dkt. 152-35		Incomplete or No Translation Provided; Rule of Completeness (FRE 106); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
389	8/16/2006	Filing by Chevron with Superior Court of Justice, Nueva Loja in Spanish with relevant portions translated to English	Dkt. 153-1		Incomplete or No Translation Provided; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
390	8/25/2006	Filing by Chevron with Superior Court of Justice, Nueva Loja in Spanish and English translation	Dkt. 153-2		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Rule of Completeness (FRE 106); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
391	12/10/2009	Provincial court of Justice of Sucumbios, Ecuador's Appointment of Expert Jose Lopez in Spanish with English translation	Dkt 153-3		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
392	12/15/2009	Filing by Jose Lopez of Activities and Chronology of Work in Spanish with English translation	Dkt 153-4		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
393	1/5/2010	Provincial Court of Justice of Sucumbios, Ecuador's Order in Spanish with English translation	Dkt. 153-5		Inadmissible Hearsay (FRE 801/802/805)
394	1/8/2010	Filing by Chevron with Provincial Court of Justice of Sucumbios in Spanish with English translation	Dkt 153-6		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
395	2/14/2011	Judgment of the Lago Agrio, Ecuador Court with English translation	Dkt 153-7		No objections, so long as not offered for the truth of the matter asserted
396	2/22/2010	Filing by Chevron with Provincial Court of Justice of Sucumbios in Spanish with English translation	Dkt 153-8		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
397	2/2/2010	Provincial Court of Justice of Sucumbios Order in Spanish with English translation	Dkt 153-9		Incomplete or No Translation Provided; Rule of Completeness (FRE 106); Inadmissible Hearsay (FRE 801/802/805)
398	2/22/2010	Filing by Chevron with the Provincial court of Justice of Sucumbios in Spanish with English translation	Dkt 153-10		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
399	3/23/2010	Provincial Court of Justice of Sucumbios Order in Spanish with English translation	Dkt 153-11		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
400	3/30/2010	Filing by Chevron with the Provincial Court of Justice of Sucumbios in Spanish with English translation	Dkt. 153-12		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
401	3/30/2010	Filing by expert Jose Lopez with Provincial Court of Justice of Sucumbios in Spanish with English translation	Dkt. 153-13		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
402	4/7/2010	Filing by expert Jose Lopez with Provincial Court of Justice of Sucumbios in Spanish with English translation	Dkt. 153-14		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
403	4/14/2010	Filing by expert Jose Lopez with Provincial Court of Justice of Sucumbios in Spanish with relevant portions translated to English	Dkt. 153-15		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
404	6/3/2010	Filing by expert Marcelo Munoz with Provincial Court of Justice of Sucumbios in Spanish with English translation	Dkt. 153-16		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
405	10/29/2010	Filing by expert Marcelo Munoz with Provincial court of Justice of Sucumbios in Spanish with English translation	Dkt. 153-17		No Objections
406	10/11/2010	Provincial Court of Justice of Sucumbios Order in Spanish with relevant portions translated to English	Dkt. 153-18		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
407	2010	<i>The Atlantic</i> article "A Spy in the Jungle" by Mary Cuddehe	Dkt. 153-19		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
408	10/14/2009	Filing by Chevron with Provincial Court of Justice of Sucumbios	Dkt. 153-20		Incomplete or No Translation Provided; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
409	10/14/2010	Relevant portions of filings by Chevron (17H18M, 17H39M, 17H43M, 17H44M) with Provincial Court of Justice of Sucumbios	Dkt. 153-21		Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Improper Summary Exhibit (FRE 1006)
410	12/20/2010	Filing by Chevron in Aguinda v. Chevron case no. 002			Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
411	12/22/2010	Filing by Chevron in Aguinda v. Chevron case no. 002	Dkt. 154-1		Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
412	7/3/2007	Advertisement in "El Universo," an Ecuadorian newspaper	Dkt. 154-2		Stipulation as to Chevron advertising in Ecuador (Trial Tr. at 115:23-116:6); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
413	7/3/2007	Advertisement in "El comercio," an Ecuadorian newspaper	Dkt. 154-3		Stipulation as to Chevron advertising in Ecuador (Trial Tr. at 115:23-116:6); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
414	7/3/2007	Advertisement in "La Hora el Pais," an Ecuadorian newspaper	Dkt. 154-4		Stipulation as to Chevron advertising in Ecuador (Trial Tr. at 115:23-116:6); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
415	2/17/2011	Affidavit of Dr. Juan Pablo Alban Alencastro in English and Spanish	Dkt. 154-5		Improper expert opinion (FRCP 26); Inadmissible Hearsay (FRE 801/802/805)
416	2/16/2011	Affidavit of Dr. Farith Ricardo Simon	Dkt. 154-6		Improper expert opinion (FRCP 26); Inadmissible Hearsay (FRE 801/802/805)
417	10/29/2010	Letter from Dr. Marcelo Munoz Herreria to Nicolas Zambrano	Dkt. 154-7		No Objections
418	9/30/1998	Final Compliance Document between Government of Ecuador and PetroEcuador	Dkt. 154-8		Waste of Time, Unfair Delay, Cumulative (FRE 403)
419	1/8/2007	English translation of Memorandum of Understanding Among the Ecuadorian State, PetroEcuador and Texaco Petroleum Company	Dkt. 154-9		No Objections
420	10/20/1994	Letter from Teodoro Bustamante to Geovanny Rosania	Dkt. 154-10 CA 1105866; 868-869		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
421	12/16/1994	English translation of Memorandum of Understanding Between the Government of Ecuador, PetroEcuador and Texaco Petroleum Company	Dkt. 154-11		No Objections
422	7/20/2009	<i>The Wall Street Journal</i> article, "Chevron Looks for Home-Field Advantage In Ecuador fight"	Dkt. 154-12		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
423	5/3/2009	<i>GlobalPost</i> article, "Chevron vs. Ecuadorean activists"	Dkt. 154-13		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
424	2/14/2011	Chevron press release, "Illegitimate Judgment Against Chevron in Ecuador Lawsuit"	Dkt. 154-14		No Objections
425	2/14/2011	The New York Times article, "Ecuador Judge Orders Chevron to Pay \$9 Billion"	Dkt. 154-15		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
426	2011	LinkedIn profile of Alfredo Guerrero	Dkt. 154-16		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
427	4/29/2010	Prosecutor's Opinion	Dkt. 154-17 --154-20; 155-1--155-7		No objections, so long as not offered for the truth of the matter asserted
428	1/17/2011	Filing by Attorney Pablo Fajardo Mendoza to the Provincial Court of Justice of Sucumbios, Lago Agrio, Ecuador	Dkt. 155-8		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
429	2/1/2011	Filing by Attorney Pablo Fajardo Mendoza to the Provincial court of Justice of Sucumbios, Lago Agrio Ecuador	Dkt. 155-9		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
430		INTENTIONALLY LEFT BLANK			[Withdrawn]
431	4/17/13	Email from Roger Parloff to James Tyrrell with subject "reporter's inquiry"	Dkt. 1324-2; pgs 1-3 of 18		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
432	4/17/2013	Motion for leave to File Declaration of Anne champion in further Support of Opposition to Defendants' Joint Motion to Reconsider with 2 attachments: 1) Motion for Leave to File Declaration of Anne champion in further support of Opposition to motion to Reconsider. 2) Declaration of Anne champion in further Support of Opposition to Motion to Reconsider	Dkt. 1324-2, pgs 4-8 of 18		Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Document provided does not match exhibit description
433	4/17/2013	Joint press release by Chevron and Burford, titled "Chevron and Burford Joint Statement Regarding The Lago Agrio Litigation"	Dkt. 1324-2; pgs 9-10 of 18		No Objections

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
434	4/17/2013	Gavin Broady's article titled "Patton Boggs Lied to fund \$19B Chevron Suit, Investor Says"	Dkt. 1324-2; pgs 11-13 of 18		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
435	4/17/2013	Roger Parloff's article "Litigation finance firm in chevron case says it was duped by Patton Bogg", Fortune Magazine	Dkt. 1324-2; pgs 14-18 of 18		Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
436	4/17/2013	Jan Wolfe's article, "Burford Inks Deal with Chevron, Says Patton Boggs Hid Truth About Ecuadorian Plaintiffs" <i>The American Lawyer</i>	Dkt. 1324-3; pgs 1-3 of 33		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
437	1/20/2011	"Proposed RICO Media Plan"	Dkt. 1324-3; pgs 4-6 of 33 Bates numbers CVX-RICO-4730819 --- CVX-RICO- 4730820		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
438	2/22/2013	Letter from counsel for Chevron to counsel for Defendants enclosing materials as part of its continuing production in Chevron Corp. v. Donziger, et al.	Dkt. 1324-3; pgs 7-9 of 33		Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Not Evidence
439	3/8/2013	Letter from Chevron counsel to counsel for Defendants enclosing materials as part of its continuing production in Chevron corp. v. Donziger	Dkt. 1324-3; pgs 10-17 of 33		Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Not Evidence

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
440	4/25/2013	Letter from Chevron counsel to counsel for defendants enclosing materials as part of its continuing production in Chevron corp. v. Donziger	Dkt. 1324-3; pgs 18-20 of 33		Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Not Evidence
441	2/18/2011	Email from Sue Sepulveda at Burford Group Ltd. To Christopher Bogart at Burford with subject "Another article from AmLaw Lit Daily"	Dkt. 1324-3; pgs 21-23 of 33 Bates numbers BUR0003453 --- BUR0003454		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
442	5/2/2013	Letter from counsel for the Defendants to counsel for Chevron regarding deficiencies and irregularities relative to chevron's production of documents originally produced to them by Burford Capital LLC and related entities in the matter of chevron Corp v. Donziger et al.	Dkt. 1324-3; pgs 24-27 of 33		Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Not Evidence
443	5/6/2013	Letter from Chevron counsel to Defendants' counsel regarding Chevron's production of documents from burford Capital LLC and related entities in the matter of Chevron Corp v. Donziger et al.	Dkt. 1324-3; pgs 28-30 of 33		Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Not Evidence
444	5/8/2013	Letter from counsel for Defendants to counsel for Burford in the matter of Chevron Corp v. Donziger et al.	Dkt. 1324-3; pgs. 31-33 of 33		Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Not Evidence

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
445	6/23/2010	Email from Christopher Bogart of Burford to Nicolas Economou of H5 and Steven Donziger copying several others, subject "Burford revised proposal," with attachment "Burford Capital Aguinda Presentation June 22, 2010"	Dkt. 1324-4; pgs 1-15 of 36 Bates numbers BUR0000045 --- BUR0000058		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
446	8/9/2011	Email from Christopher Bogart of Burford to Jonathan Molot and Elizabeth O'Connell of Burford and others with the subject, "Chevron – interim report text," with attachment "Lago Agrio insert Aug 9 2011 draft"	Dkt. 1324-4; Pgs 16-18 of 36 Bates numbers BUR0046323 --- BUR0046324		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
447	Undated	"Checklist," with attachment "CHECKLIST OF DOCUMENTS TO COME"	Dkt. 1324-4; Pgs 19-22 of 36 Bates numbers CVX-RICO-1480568 --- CVX RICO-1480570		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Illegible Document (FRE 1003)
448	1/27/2011	Email from Jonathan Molot of Burford Group Ltd. To Christopher Bogart of Burford, subject "draft to Ernie"	Dkt. 1324-4; Pgs. 23-24 of 36 Bates numbers BUR0056893		No objections, so long as not offered for the truth of the matter asserted
449	9/18/2011	Email from Christopher Bogart of Burfor to Jonathan Molot of Burford and others, subject "Chevron Q&A", with attachment "Burford Lago Agrio Q&S draft 18 Sept 2011"	Dkt. 1324-4; Pgs 25-31 of 36 Bates numbers BUR0021513--- BUR0021518		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
450	Sept/Oct 2011	Emial chain between Paul Damon of FTI Consulting, Christopher Bogart and Jonathan Molot of Burford and others, subject "RE: Update on Bloomberg and WSJ Stories"	Dkt. 1324-4; Pgs 32-36 of 36 Bates numbers BUR0017498---BUR0017501		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
451	Sept 12-20, 2011	Email chain between James Tyrrell and Christopher Bogart, subject "Lunch"	Dkt. 1324-5; Pgs. 1-5 of 61		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
452	10/9/2012	Email chain between Christopher Bogart and James Tyrrell, subject "Breakfast tomorrow"	Dkt. 1324-5; Pgs 6-7 of 61		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
453	10/19/2012	Email from Christopher Bogart to James Tyrrell	Dkt. 1324-5; Pgs 8-9 of 61		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
454	10/19/2012	Email from Christopher Bogart to James Tyrrell	Dkt. 1324-5; Pgs 8-9 of 61 same as 453		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
455	9/25/2012	Roger Parloff's article, "Chevron claims Patton Boggs tried to cover up a fraud," Fortune magazine	Dkt. 1324-5; Pgs 12-20 of 61		Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
456	11/16/2012	Email chain between James Tyrrell and Christopher Bogart, subject "ICC Litigation Funding Conference"	Dkt. 1324-5; Pgs 21-23 of 61		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
457	11/15/2012	Email from Aviva Will to James Tyrrell	Dkt. 1324-5; Pgs 24-25 of 61		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
458	5/1/2013	Letter from counsel for chevron to counsel for Defendants in the matter <i>Chevron Corp v. Donziger, et al.</i>	Dkt. 1324-5; Pgs 26-28 of 61		Best evidence rule (FRE 1002); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
459	Dec 14-17, 2012	Email chain between Andrew Langhoff, Jonathan Molot, and James Tyrrell, subject, "Tommy Boggs"	Dkt. 1324-5; Pgs 29-30 of 61		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
460	9/25/2012	Relevant pages from Hearing before Hon. Lewis A. Kaplan, U.S.D.J. in the matter of <i>In re Application of Chevron Corp</i>	Dkt. 1324-5; Pgs 31-48 of 61		Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Not Evidence
461	4-Feb-13	Email chain between Andrew Langhoff to Kevin O'Neill, subject "Potential new client"	Dkt. 1324-5; Pgs 49-50 of 61		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
462	Feb 5 – Mar 13, 2013	Email chain between Andrew Langhoff and Kevin O'Neill, subject "Potential new client"	Dkt. 1324-5; Pgs 51-54 of 61		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
463	2/5/2011	Email chain between Selvyn Seidel and Christopher Bogart, subject "Ecuador"	Dkt. 1324-5; Pgs 55-56 of 61 BUR0016588		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
464	8/18/2010	Email chain between Adlai Small and Frank Schwitter copying Selvyn Seidel, Eric Westenberger, James Tyrrell and Edward Yennock, subject "Invictus – Case summary and action plan – PRIVILEGED AND CONFIDENTIAL"	Dkt. 1324-5; Pgs 57-61 of 61 PB_SUB_00031731 --- PB_SUB_00031734		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
465	8/18/2010	Chevron's Memorandum of Law in Support of <i>Ex Parte</i> Application for an Order Pursuant to 28. U.S.C. §1782 to Conduct discovery for Use in Foreign Proceedings, in the matter <i>In re Application of Chevron Corp.</i>	Dkt. 1324-6 Pgs 1-33 of 33		Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
466		INTENTIONALLY LEFT BLANK			[Withdrawn]
467		INTENTIONALLY LEFT BLANK			[Withdrawn]
468	3/10/2009	Memorandum from Chris Gidez and Glen Rochkind of Hill & Knowlton to Don Campbell and Kent Robertson of chevron, subject "Key Messaging/Likely Questions for 60 Minutes Interview"	Dkt. 1324-8 Pg. 31 of 151 Bates numbers CVX-RICO-4885717--- CVX-RICO-4885733	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
469	12/3/2010	Email from Jonathan Molot to Selvyn Seidel copying Christopher Bogart, all of Burford, subject "FW: Attorney client communication", with attachment "2010 12 01 DRAFT depo transcript of Steven Donziger.pdf"	Dkt. 1324-8 Pgs. 32-33 of 151 BUR0065823		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
470	Jan 8-9, 2011	Email chain between Mark Hansen, Jeffrey Harris of Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C. and Jonathan Molot and Christopher Bogart of Burford, forwarding a rough draft of Steve Donziger's 1/8/11 deposition transcript	Dkt. 1324-8 Pgs 34-35 of 151 Bates number BUR0065253		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
471	1/19/2011	Email from Mark Hansen to Jonathan Molot and Christopher Bogart, forwarding a rough draft of Steve Donziger's 1/18/11 deposition transcript	Dkt. 1324-8 Pgs 36-37 of 151 Bates number BUR0063365		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
472	1/19/2011	Email from mark Hansen to Jonathan Molot and Christopher Bogart, forwarding a rough draft of Steve Donziger's 1/19/11 deposition transcript	Dkt. 1324-8 Pgs 38-39 of 151 Bates number BUR0064072		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
473	1/14/2011	Relevant pages of 1/14/11 deposition transcript of Steven Donziger in <i>In re Application of Chevron</i>	Dkt. 1324-8 Pgs 40-109 of 151		Violates pretrial order re: proper format for deposition designations (Judge Kaplan Individual Rules and Practices at 8); Rule of Completeness (FRE 106); Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
474	Jan 14-17, 2011	Email chain between Mark Hansen, Jeffrey Harris, Jonathan Molot and Christopher Bogart re rough draft of Steven Donziger's 1/14/11 deposition that was forwarded by Mr. Donziger's counsel, Timothy Haggerty	Dkt. 1324-8 Pgs 110-111 of 151 Bates number BUR0064018	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
475	12/18/2010	Email sent from Christopher Bogart to himself, blind copying many, subject "WSJ article posted tonight, Burford mentioned"	Dkt. 1324-8 Pgs 112-118 of 151 Bates numbers BUR0070084-BUR0070089		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
476	12/23/2010	Email from Selvyn Seidel to Christopher Bogart and Jonathan Molot, copying others, subject "FWD: Sec.1782 and Third-Party Funding – Two Hot International Arbitration topics begin to Overlap"	Dkt. 1324-8 Pgs 119-123 of 151 Bates numbers BUR0035750-BUR0035753		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
477	12/17/2010	Daniel Fisher's article "Chevron Ecuador Case a Shambles, Former Backer Says," <i>Forbes</i>	Dkt. 1324-8 Pgs 124-127 of 151		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
478	1/3/2011	Email from Christopher Bogart to James Tyrrell	Dkt. 1324-8 Pgs 128-129 of 151		No Objections
479	2011	A portion of Stevn Donziger's deposition testimony produced by Burford	Dkt. 1324-8 Pgs 130-133 of 151 Bates numbers BUR0064530---BUR0064532		Violates pretrial order re: proper format for deposition designations (Judge Kaplan Individual Rules and Practices at 8); Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
480	10/29/2010	Email from Aviva Will to Jonathan Molot, subject "Re: Chevron – In case you haven't seen AMLaw's Alert"	Dkt. 1324-8 Pgs 134-136 of 151 Bates numbers BUR0000001--- BUR0000002		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
481	10/29/2010	Email from Christopher Bogart to Jonathan Molot, subject "RE: The Am law daily News Alert – Exclusive – Chevron in Ecuador – The taps the Plaintiffs Don't Want You to See"	Dkt. 1324-8 Pgs 137-139 of 151 Bates numbers BUR0017933--- BUR0017934		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
482	6/2/2011	Email from Chistopher Bogart to Aviva Will, subject "Fwd: Trecia"	Dkt. 1324-8 Pgs 140-142 of 151 Bates numbers BUR0057547--- BUR0057548		No Objections
483	Undated	Handwritten notes produced by Burford	Dkt. 1324-8 Pgs 143-144 of 151 Bates number BUR0004496		No Objections
484	1/25/2011	Email from Michael Buckley to Dave Samson and Kent Robertson, subject "FW: Press Release: Burford Group Expands with New U.S. Appointments"	Dkt. 1324-8 Pgs 145-147 of 151 Bates numbers CVX-RICO-4938352--- CVX-RICO-4938353		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
485	5/22/2013	Ernest J. Getto's biography found on Latham & Watkins LLP's website	Dkt. 1324-8 Pgs 148-151 of 151		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
486	2/1/2011	Email chain between Ernie Getto, Christopher Bogart and Jonathan Molot, subject "letter to Judge Kaplan"	Dkt. 1324-9 Pgs 1-5 of 53 Bates number BUR0005198--- BUR0005201		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
487	2/1/2011	Email from Ernie Getto to Christopher Bogart and Jonathan Molot, subject "Fw: Russell/Calmbacher/Koln"	Dkt. 1324-9 Pgs 6-7 of 53 Bates number BUR0053872		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
488	2/1/2011	Email from Ernie Getto to Christopher Bogart	Dkt. 1324-9 Pgs 8-9 of 53 Bates number BUR0057437		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
489	2/1/2011	Email from Ernie Getto to Christopher Bogart, subject "Donziger Deposition Testimony re: Alegato"	Dkt. 1324-9 Pgs 10-13 of 53 Bates number BUR0072383--- BUR0072385		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
490	7/9/2011	Email from Ernie Getto to Steve Wilson, subject "Re: Dave Rogers"	Dkt. 1324-9 Pgs 14-15 of 53 Bates numbers' BUR0005157		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
491	9/5/2010	Email from Jonathan Molot to Christopher Bogart, Selvyn Seidel and others with attachment, "Presentation Regarding Potential Burford Investment in Ecuador Matter 09 04 10.docx"	Dkt. 1324-9 Pgs 16-17 of 53 Bates numbers BUR0063263		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
492	1/27/2011	Email from Christopher Bogart to Ernie Getto copying Jonathan Molot, subject "Tonight"	Dkt. 1324-9 Pgs 18-21 of 53 Bates numbers BUR0056012--- BUR0056014		No Objections
493	2/11/2011	Email from Christopher Bogart to Randy Mastro of Gibson Dunn, subject "Fwd: The am Law Litigation Daily – February 11, 2011 – Litigator of the week"	Dkt. 1324-9 Pgs 22-25 of 53 Bates numbers BUR0071161--- BUR0071164		No Objections

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
494	2/22/2011	Email from Mark Hansen to Christopher Bogart forwarding an email Mr. Hansen sent to Randy Mastro, subject "Burford Group"	Dkt. 1324-9 Pgs 27-28 of 53 Bates numbers BUR0049986		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
495	3/4/2011	Email from Christopher Bogart to Steve Wilson	Dkt. 1324-9 Pgs 29-30 of 53 Bates numbers BUR0047966		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
496	8/4/2011	Email from Christopher Bogart to Jonathan Molot, subject "Fwd: Randy Mastro called"	Dkt. 1324-9 Pgs 31-33 of 53 Bates numbers BUR0049969--- BUR0049970		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
497	1/28/2011	Email from Christopher Bogart to Selvyn Seidel, copying Jonathan Molot, subject "Ecuador"	Dkt. 1324-9 Pgs 34-36 of 53 Bates number BUR000036- BUR0000337		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
498	June 22-23, 2010	Email chain between Eric Westenberger, Christopher Bogart, and Selvyn Seidel copying James Tyrrell, Jonathan Molot, and Edward Yennock, subject "Ecuador"	Dkt. 1324-9 Pgs 37-40 of 53 Bates numbers BUR0055372--- BUR0055374		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
499	June 10-16, 2011	Email chain between Christopher Bogart, Ernie Getto, Peter Benzian and Jonathan Molot and Doug Donsky, subject "released recently"	Dkt. 1324-9 Pgs 41-45 of 53' Bates numbers BUR0011487--- BUR0011490		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
500	Feb 3-9, 2011	Email chain between Roger Parloff, Christopher Bogart, and Jonathan Molot, subject "Alternative Litigation financing"	Dkt. 1324-9 Pgs 46-53 of 53 Bates numbers BUR0000077--- BUR0000083		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
501	6/15/2011	Email chain between Christopher Bogart and Doug Donsky copying Ernie Getto and others with the subject "released recently"	Dkt. 1324-10 Pgs 1-3 of 7 Bates numbers BUR0012138--- BUR0012139		No objections, so long as not offered for the truth of the matter asserted
502	5/31/2011	Roger Parloff's article, "Have you got a piece of this lawsuit", <i>Fortune</i>	Dkt. 1324-10 Pgs 4-7 of 7		Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
503	8/23/2011	Email chain between Kent Robertson and Stephen Burns, subject "Ecuador Litigation – American Lawyer Article"	Dkt. 1324-11 Pgs 1-5 of 12 Bates numbers CVX-RICO-4769255---CVX-RICO-4769258		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
504	3/26/2009	Email chain between William Irwin, Kent Robertson, Chris gidez and others, subject "Response language for Crude"	Dkt. 1324-11 Pgs 6-7 of 12 CVX-RICO4875276--- CVX-RICO-4875279	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
505	10/14/2008	Memorandum from Sam Singer to Kent Robertson, subject "Ecuador Communications Strategy"	Dkt. 1324-11 Pgs 9-12 of 12 CVX-RICO-4746090-- -CVX-RICO-4746093		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Illegible Document (FRE 1003)
506	9/4/2010	"Presentation Regarding Potential Burford Investment"	Dkt. 1324-12 Pgs. 1-9 of 9 BUR0063264-71		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
507	5/6/2013	Letter from counsel for Chevron to counsel for Defendants, in the matter <i>Chevron Corp. v. Donziger, et al.</i>	Dkt. 1324-13 Pgs. 1- 3 of 3		Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
508	10/6/2010	Relevant pages from 10/6/10 Deposition transcript of Douglas Beltman taken in the matter of <i>Chevron Corp. v. Stratus Consulting, Inc., et al</i>	Dkt. 1324-14 Pgs. 1-10 of 26		Violates pretrial order re: proper format for deposition designations (Judge Kaplan Individual Rules and Practices at 8); Rule of Completeness (FRE 106); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
509	4/24/2013	Relevant pages from the 4/24/13 Deposition transcript of Andres Rivero taken in the matter <i>Chevron Corp. v. Donziger, et al.</i>	Dkt. 1324-14 Pgs. 11-26 of 26		Violates pretrial order re: proper format for deposition designations (Judge Kaplan Individual Rules and Practices at 8); Rule of Completeness (FRE 106); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
510	2/28/2013	Expert report of Juan Pablo Alban Alencastro and exhibits	Exhibit 4300 (75 pages)		Inadmissible Hearsay (FRE 801/802/805)
511	2/16/2011	Expert report of Farith Ricardo Simon Campana and exhibits	Exhibit 4400 (18 pages)		Inadmissible Hearsay (FRE 801/802/805)
512	2/28/2013	Expert report of Raul Rosero Rivas and exhibits	Exhibit 3900 (18 pages)		Inadmissible Hearsay (FRE 801/802/805)
513		INTENTIONALLY LEFT BLANK			[Withdrawn]
514	Undated	CV of Diego Borja	ACH-DB000775- ACH-DB000780	X	Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
515	Sept.07-Aug. 09	InterIntelg invoices	ACH-DB000517- ACH-DB000561	X	Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
516	8/11/09-1/26/11	Chevron Borja Invoices	ACH-DB000642- ACH-DB000666	X	Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
517		INTENTIONALLY LEFT BLANK			[Withdrawn]
518	8/23/2004	Texaco Invoice	Exhibit 5-Borja-3/15/11		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
519	8/17/2004	Shipping label	Exhibit 6-Borja-3/15/11		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
520	Nov. 04-Dec 06	STL Chain of custody records	Exhibit 7-Borja-3/15/11		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
521	Nov 05-Apr 06	Analytical report cover pages prepared for Groundwater Services; project manager Sara Portilla	Exhibit 8-Borja-3/15/11		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
522	6/29/2010	Arguedas, Cassman & Headley, LLP invoice, (partially redacted)	ACH-DB000867--- ACH-DB000869	X	Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
523	6/27/2009	Statement by Diego Borja	ACH-DB000009--- ACH-DB000013	X	Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
524	10/1/2009	Transcript 4 – Recorded conversation between Diego Borja & Santiago Escobar	ACH-D B000396--- ACH-DB000411		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
525	10/31/2009	Transcript 26 – Recorded conversation between Diego Borja & Santiago Escobar	ACH-DB000094--- ACH-DB000133		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
526	10/18/2009	Transcript 25 – Recorded conversation between Diego Borja & Santiago Escobar	ACH-DB000134--- ACH-DB000171		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
527		INTENTIONALLY LEFT BLANK			[Withdrawn]
528		INTENTIONALLY LEFT BLANK			[Withdrawn]
529		INTENTIONALLY LEFT BLANK			[Withdrawn]
530		INTENTIONALLY LEFT BLANK			[Withdrawn]
531	10/16/2009	Statement by Diego Borja	Exhibit 18-Borja-3/15/11		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
532	6/12/2009	Financial Times article, "Chevron fights Ecuador pollution lawsuit" By Naomi Mapstone	Exhibit 19-Borja-3/15/11		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
533	5/23/2009	The Economist article "Ecuador and Chevron: The Hounding of an American Oil Company"	Exhibit 20-Borja-3/15/11		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
534		INTENTIONALLY LEFT BLANK			[Withdrawn]
535		INTENTIONALLY LEFT BLANK			[Withdrawn]
536		INTENTIONALLY LEFT BLANK			[Withdrawn]
537		INTENTIONALLY LEFT BLANK			[Withdrawn]
538		INTENTIONALLY LEFT BLANK			[Withdrawn]
539		INTENTIONALLY LEFT BLANK			[Withdrawn]
540		INTENTIONALLY LEFT BLANK			[Withdrawn]
541	10/1/2009	Transcript 6 – Recorded conversation between Diego Borja & Santiago Escobar	ACH-DB000368--- ACH-DB000382		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
542	10/15/2009	Transcript 24 – Recorded conversation between Diego Borja & Santiago Escobar	ACH-DB000172--- ACH-DB000222		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
543	10/1/2009	Transcript 11 - Recorded conversation between Diego Borja & Santiago Escobar	ACH-DB000305--- ACH-DB000318		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
544	10/1/2009	Transcript 2 - Recorded conversation between Diego Borja & Santiago Escobar	ACH-DB000427--- ACH-DB000442		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
545	10/1/2009	Transcript 3 - Recorded conversation between Diego Borja & Santiago Escobar	ACH-DB000412--- ACH-DB000426		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
546	10/7/2009	Transcript 21 - Recorded conversation between Diego Borja & Santiago Escobar	ACH-DB000244--- ACH-DB000256		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
547	10/1/2009	Transcript 5 - Recorded conversation between Diego Borja & Santiago Escobar	ACH-DB000383--- ACH-DB000395		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
548	10/1/2009	Transcript 1 - Recorded conversation between Diego Borja & Santiago Escobar	ACH-DB000443--- ACH-DB000458		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
549	10/1/2009	Transcript 19 - Recorded conversation between Diego Borja & Santiago Escobar	ACH-DB000268--- ACH-DB000279		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
550		INTENTIONALLY LEFT BLANK			[Withdrawn]
551	8/20/2009	Email from Pablo E Meneses to borja@ctceq.com, copying Allen Verstuyft, Subject Contract for Lab Disposal; with attachment Contract between Texaco and InterIntelg S.A.	PRIV-DB000939 PRIV-DB000940	X	Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
552	7/13/09-8/11/09	Email chain beginning with email from Mark Sigler, to Sara McMillen, Alejandro DeJesus, CC'ing Rick Green, Allen Verstuyft, subject "Re: Close out of Sample management"	PRIV-DB001262 – 265	X	Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
553	8/7/09-8/20/09	Email between Pablo Menses, Sara Portilla, eduardo.borja@ctceq.com, Allen Verstuyft and borjad@ctceq.com , subject Incineration, with two attachments	PRIV-DB000981--- PRIV-DB000982	X	Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
554	8/26/2009	Email from David B Moyer to Laurel Headley, Susan Bierbenbaum; CC'ing Mike Anderson, and John Cline, Subject Sara & Diego US entries, with one attachment, handwritten notes	PRIV-DB000257--- PRIV-DB000258	X	Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
555		INTENTIONALLY LEFT BLANK			[Withdrawn]
556		INTENTIONALLY LEFT BLANK			[Withdrawn]
557		INTENTIONALLY LEFT BLANK			[Withdrawn]
558		INTENTIONALLY LEFT BLANK			[Withdrawn]
559		INTENTIONALLY LEFT BLANK			[Withdrawn]
560		INTENTIONALLY LEFT BLANK			[Withdrawn]
561		INTENTIONALLY LEFT BLANK			[Withdrawn]

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
562	10/1/2009	Transcript of recorded conversation between Diego Borja & Santiago Escobar; Spanish with English translation	Exhibit 49-Borja-3/16/11 (12 pages)		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
563		INTENTIONALLY LEFT BLANK			[Withdrawn]
564		INTENTIONALLY LEFT BLANK			[Withdrawn]
565		INTENTIONALLY LEFT BLANK			[Withdrawn]
566		INTENTIONALLY LEFT BLANK			[Withdrawn]
567		INTENTIONALLY LEFT BLANK			[Withdrawn]
568		INTENTIONALLY LEFT BLANK			[Withdrawn]
569	Apr-08	CIASA Corporate Position Statement	Exhibit 56 – Borja - 3/17/11 (51 pages)	X	Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402)
570	5/22/2009	Email exchange between Pablo Fajardo and Steven Donziger, CC'ing Juan Pablo Saenz, Julio Prieto, Luis Yana and Luis Villacreces, subject Re: Confidential but necessary	Exhibit 57 – Borja - 3/17/11 (5 pages)	X	Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402)
571		INTENTIONALLY LEFT BLANK			[Withdrawn]

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
572		INTENTIONALLY LEFT BLANK			[Withdrawn]
573	6/22/2009	Email from Ruben Miranda to Diego Borja re account information	PGE00000172 (2 pages) Exhibit 60 Borja-3/17/11	X	Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402)
574	6/22/2009	Email from Ruben Miranda to Diego Borja re account information	PGE00000173 (2 pages) Exhibit 61 Borja-3/17/11	X	Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402)
575	6/23/2009	Email from Ruben Miranda to Diego Borja re more account information	PGE00000174 (2 pages) Exhibit 62 Borja-3/17/11	X	Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402)
576		INTENTIONALLY LEFT BLANK			[Withdrawn]
577		INTENTIONALLY LEFT BLANK			[Withdrawn]
578		INTENTIONALLY LEFT BLANK			[Withdrawn]
579	10/1/2009	Transcript 10-Recorded conversation between Diego Borja & Santiago Escobar	Exhibit 66 Borja 3/17/11 18 pages		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
580	3/3/2010	Email exchange between Karen Hinton, Steven Donziger, Andrew Woods, and Laura Garr, subject Photographer, attachements-photos	DONZ00029708--- DONZ00029711		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
581	2011	"Photos of the House that Chevron Is Payinbg \$6,000 a Month to Hide Diego Borja" on website, Amazon Watch, Frente de Defensa de la Amazonia	Exhibit 68 Borja 3/17/11		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
582	Undated	Wanted photo of Diego Borja	Exhibit 69 Borja 3/17/11		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402)
583	3/4/2011	Declaration of Julio C. Gomez with Exhibits	Dkt. 174-00—174-59; 175-00—175-14; 176-00—176-03		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Failure to identify with particularity; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Improper Summary Exhibit (FRE 1006)
584	3/18/2013	Declaration of C. Smyser	Dkt. 918-00—918-61		Failure to identify with particularity; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Improper Summary Exhibit (FRE 1006)
585	2010	"A Spy in the Jungle" article by Mary Cuddehe	CVX-RICO-5549371--- CVX-RICO-5549374		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
586	6/1/2013	Declaration of Denis Collins	Dkt 1197-2		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
587	4/17/2013	Declaration of Christopher Bogart with attachment	Dkt. 1039-2		No Objections

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
588	3/22/2013	Witness Statement of Douglas Beltman	Dkt. 1007-1		No Objections
589		INTENTIONALLY LEFT BLANK			[Withdrawn]
590	7/23/2010	Spanish Transcript and English translation of Jhinsop Martinez Erraez interviewed by Mitchell Anderson of Amazon Watch	Exhibit 2502 Martinez 9/12/11 Pages 1-8		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
591	Apr-06	Judicial Inspection playbook redacted	Dkt 17-6 BJORKMAN00049534 - 49580		No objections, so long as offered for the limited purpose for which exhibit was admitted; otherwise, Chevron objects as follows: Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
592	Undated	Sample Plan Calendario	5 pages		No Objections
593	8/28/2006	Evaluation of Chevron's Sampling and Analysis Methods	Exhibit McMillen 4 6/14/13		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
594	3/18/2006	Summary of Sampling and Testing Program for Judicial Inspection Sites	CVX-RICO-3567406 - 7413		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
595	11/10/2012	Excerpt of deposition transcript of John A. Connor	Exhibit McMillen 6 6/14/13		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Violates pretrial order re: proper format for deposition designations (Judge Kaplan Individual Rules and Practices at 8); Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Not Evidence
596	12/6/2012	Certified Transcript Excerpt of John A. Connor deposition	Exhibit McMillen7 6/14/13		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Violates pretrial order re: proper format for deposition designations (Judge Kaplan Individual Rules and Practices at 8); Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
597	Undated	Photograph	Defendant's exhibit Moncayo 1—9/13/11		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Authentication (FRE 901/902); Incomplete or Inaccurate Description or Document
598	Undated	Photograph	Defendant's exhibit Moncayo 2—9/13/11		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Authentication (FRE 901/902); Incomplete or Inaccurate Description or Document
599	Undated	Photograph	Defendant's exhibit Moncayo 3—9/13/11		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Authentication (FRE 901/902); Incomplete or Inaccurate Description or Document

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
600	Undated	Photograph	Defendant's exhibit Moncayo 4—9/13/11		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Authentication (FRE 901/902); Incomplete or Inaccurate Description or Document
601	Undated	Photograph	Defendant's exhibit Moncayo 5—9/13/11		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Authentication (FRE 901/902); Incomplete or Inaccurate Description or Document
602	8/6/2008	Email from William T. Irwin to SDonehoo@maglobal.com, subject: Fw: Ecuador PR Team Weekly Call	CVX-RICO-5042471	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
603	8/27/2010	Declaration of Robinson Yumbo Salazar	CVX-RICO-1622893 - 97		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
604	8/27/2010	Declaration of Donald Rafael Moncayo Jimenez	CVX-RICO-2495010 - 14		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
605		INTENTIONALLY LEFT BLANK			[Withdrawn]
605C	1/6/2012	Ecuadoran appellate decision	Case 11-150 Document 626-2		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
605D	1/13/2012	Ecuadoran appellate clarification	Case 11-1150 Doc 2635-2		Inadmissible Hearsay (FRE 801/802/805)
605I	3/28/2013	Zambrano Declaration	Case 1:11-cv-00691-LAK-JCF Doc 974-1		No objections, so long as not offered for the truth of the matter asserted

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
605J		Excerpt of Lago Agrio Record Cuerpo 666	73.587		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document
605K		Excerpt of Lago Agrio Record Cuerpo 108	12.008		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document
605L	11/17/2004	Excerpt of Lago Agrio Record Cuerpo 108	12.047		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document
605M	2/2/2006	Excerpt of Lago Agrio Record Cuerpo 1076	92.686		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Incomplete or Inaccurate Description or Document

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
605N	10/23/2008	Excerpt of Lago Agrio Record Cuerpo 1416	151.454		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document
605O	7/26/2006	Excerpt of Lago Agrio Record Cuerpo 1439	153.734-737 92.686-688		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document
605P		Expert Bianchi Benzene results	76.347		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document
605Q	12/8/2005	Expert Bjorkman Benzene results	105.181		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
605R	10/13/2005	Expert Salcedo Barium results	98.529		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document
605S	4-Oct	Expert Connor Barium results	70.103		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document
605T		Expert Bianchi Barium results			Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document
605U	10/13/2005	Expert Salcedo Lead results	98.529		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
605V	11/28/2005	Expert Suarez Cadmium results	100.462		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document
605W		Expert Bianchi Cadmium results			Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document
605X	11/15/2006	Expert Morales Cadmium results	128.149-150, 128.154-159, 128.162, 128.164, 128.166-167, 128.169		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
605Y		Auca 01_expert statements TEX			Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
605Z		Excerpt from the Lago Agrio Record	141.312 - 141.358		Incomplete or No Translation Provided; Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document
605DE	8/1/2011	2011 Staats Report			Improper expert opinion (FRCP 26); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
605DF	8/17/2007	Cabrera's Aug 2007 request for information [ENG]	132.232		Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
605DI	1/30/2008	Court order formalizing Cabrera's request for information [ENG]	134.157		No objections, so long as not offered for the truth of the matter asserted
605DP	2003	2003 Chevron Answer in Aguinda case			Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26)
605DR	8/17/2007	Cabrera filing	132.232		Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document
605DS	1/7/2008	Cabrera filing	133.987		Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document
605DV	11/18/2010	Chevron motion to recuse Ordonez	Case 2:10-mc-00091-wks Doc 27-4, 27-5		Failure to timely produce - does not appear on either Defendants' PTO or amended exhibit list (FRCP 26; DI 1421); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
605DW	11/1/2010	Zambrano order	Case 1:10-cv-00047-MSK-Meh Doc 276-34		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
605DY	7/26/2011	Chevron Final Alegato (English)	Case 1:11-cv-03718-LAK-JCF Doc 148-10		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document
605DZ	1/11/1999	Texaco SDNY brief	Case 1:09-cv-09958-LBS Doc 26-6		Aside from rebuttal purposes, Chevron objects as follows: Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
605EA	1/25/1999	Texaco SDNY reply brief	Case 1:09-cv-09958-LBS Doc 26-9		Aside from rebuttal purposes, Chevron objects as follows: Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
605EC	2/3/2006	Ministry of National Defense Communication	93.031		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
605ED	1/7/2008	Cabrera's Jan 2008 request for information [ENG]	133.987		Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
605HY		Fusion Memo Exhibits	140.701-785		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26)
605IA	8/2/2010	Ordonez order re: Cabrera Report	190.494		Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26)
606		INTENTIONALLY LEFT BLANK			[Withdrawn]
607	8/4/2004	John Connor Email	CVX-RICO-4972173	X	Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
608	3/27/2006	Douglas Mackay Retainer	MACKAY00054639-642		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
609	7/10/2006	Douglas Mackay Email	MACKAY00064887-88	X	Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
610	7/18/2007	Alvarez Machay Hinchee Assessment of Cabrera Work Plan	CVX-RICO-4381043-52		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
611	6/2/2009	Chevron team email	CVX-RICO-4729738-40		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
612	6/2/2009	Chevron team email	CVX-RICO-4720632-35		No objections
613	6/24/2009	Chevron team email	CVX-RICO-4757122-23		No objection as to the portions received by the Court, namely, the emails from Kent Robertson. However, Chevron rejects as follows to the rest of the document: Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
614	10/29/2009	Chevron team email	CVX-RICO-4372355-58		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
615	12/3/2009	Interviews	CVX-RICO-4389692-95		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
616	5/26/2010	Off-line' Call Email with Bianchi	CVX-RICO-4841177-78		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
617	5/26/2010	Anson Email	CVX-RICO-5592872 2873		Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
618	9/3/2010	Investigator 6 Email	CVX-RICO-5576943		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
619	9/3/2010	Fernando Reyes email	CVX-RICO-5576944-48		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
620	11/26/2010	Reyes Email	CVX-RICO-5583251-52		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Exhibit brand footer does not appear on document
621	11/29/2010	Investigator 6 Email	CVX-RICO-5583251-52		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
622	12/22/2010	Robertson email	CVX-RICO-4759981- 985		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
623	2/15/2011	Fernando Reyes email	CVX-RICO-5575474 - 476		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
624	2/15/2011	Fernando Reyes email	CVX-RICO-5575474- 476		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
625	3/8/2011	Fernando Reyes email	CVX-RICO-5577172 - 7174		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
626	7/3/2006	Chevron motion to Lago Agrio Court	Lago Agrio Record 116429		No objections
627	12/21/2010	Chevron motion to Lago Agrio Court			Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
628	12/20/2010	Chevron motion to Lago Agrio Court			Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
629	9/1/2009	Fajardo et al emails	CVX-RICO-2455574 - 577		Incomplete or No Translation Provided; Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Rule of Completeness (FRE 106); Relevance (FRE 401/402)
630	9/2/2009	Fajardo email	CVX-RICO-2455748		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
631	9/2/2009	Fajardo email	CVX-RICO-2455748		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
632	9/2/2009	Fajardo email	CVX-RICO-2455720 - 721		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
633	9/4/2009	Fajardo email	CVX-RICO-2455908		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
634	9/4/2009	Fajardo email	CVX-RICO-2455899		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
635	9/4/2009	Donziger email	CVX-RICO-2455898		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
636	9/7/2009	Fajardo email	CVX-RICO-2456050		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
637	9/8/2009	Fajardo email	CVX-RICO-2456280		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
638	9/8/2009	Fajardo email	CVX-RICO-2456117		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
639	9/8/2009	Fajardo email	CVX-RICO-2456128		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
640	9/8/2009	Fajardo email	CVX-RICO-2456240 - 6241		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
641	9/8/2009	Fajardo email	CVX-RICO-2456281		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
642	9/9/2009	Prieto email	CVX-RICO-2456297 - 6298		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
643	9/11/2009	Fajardo email	CVX-RICO-2456374		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
644	9/11/2011	Fajardo email	CVX-RICO-2456359		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
645	9/11/2009	Fajardo email	CVX-RICO-2456362		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
646		INTENTIONALLY LEFT BLANK			[Withdrawn]
647	9/13/2009	Fajardo email	DONZ00052412		Inadmissible Hearsay (FRE 801/802/805)
648	9/13/2009	Fajardo email	CVX-RICO-2456565		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
649	9/14/2009	Fajardo email	CVX-RICO-2456588		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
650	9/14/2009	Prieto email	CVX-RICO-2456584 - 6585		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
651	9/15/2009	Prieto email	CVX-RICO-2457129 - 7134		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
652	9/15/2009	Fajardo et al email	CVX-RICO-2457111 - 7115		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
653	9/15/2009	Fajardo email	CVX-RICO-2457163		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
654	9/15/2009	Fajardo email	CVX-RICO-2457119 - 7122		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
655		INTENTIONALLY LEFT BLANK			[Withdrawn]
656	9/16/2009	Fajardo email	CVX-RICO-2457190		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
657	9/17/2009	Fajardo et al email	CVX-RICO-2457220 - 7223		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
658	9/17/2009	Fajardo et al email	CVX-RICO-2457217 - 7219		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
659	9/22/2009	Fajardo email	DONZ00066884		Inadmissible Hearsay (FRE 801/802/805)
660	9/25/2009	Fajardo email	DONZ00052637		Inadmissible Hearsay (FRE 801/802/805)
661	10/19/2009	Fajardo email	DONZ00052927		Inadmissible Hearsay (FRE 801/802/805)
662	10/21/2009	Fajardo email	DONZ00052946		Inadmissible Hearsay (FRE 801/802/805)
663	10/22/2009	Fajardo email	CVX-RICO-2459392		Incomplete or No Translation Provided; Rule of Completeness (FRE 106); Inadmissible Hearsay (FRE 801/802/805)
664	10/27/2009	Fajardo email	DONZ00067019		Inadmissible Hearsay (FRE 801/802/805)
665	10/26/2009	Fajardo email	CVX-RICO-2459440		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
666	10/26/2009	Fajardo email	CVX-RICO-2459447		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
667	7/20/1992	Texaco memo	CVX-RICO-5042152		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
668	10/15/2003	Veiga email	CVX-RICO-4991179		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
669	11/5/2003	Jim Sullivan email	CVX-RICO-4342933 - 2934		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
670	11/6/2003	Jim Sullivan email	CVX-RICO-4380629		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
671	1/29/2004	Viega email	CVX-RICO-4558527 - 8528		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
672	6/28/2004	Ed Scott email	CVX-RICO-4562059-064		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
673	6/5/2009	Michaela D'Amico email	CVX-RICO-2452698 - 699		Incomplete or No Translation Provided; Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
674	6/11/2009	Brian Parker email	CVX-RICO-2705712-714		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Incomplete or Inaccurate Description or Document; Only metadata provided in paper and electronic versions of exhibit as of November 25, 2013
675	6/11/2009	Brian Parker email	CVX-RICO-2705663-664		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Incomplete or Inaccurate Description or Document; Only metadata provided in paper and electronic versions of exhibit as of November 25, 2013

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
676		Chevron's Defense Playbook	CVX-RICO-2330629 - 0638		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
677	2/25/2013	Declaration of Kevin Koenig in 13-80038-MISC CRB	Dkt. 8, Case No 3:13-mc-80038-CRB (N.D. Ca.)		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
678	2/25/2013	Declaration of Paul Paz y Mino in 13-80038-MISC CRB	Dkt. 6, Case No 3:13-mc-80038-CRB (N.D. Ca.)		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
679	6/9/2006	Email from Judith Kimerling to Ricardo Veiga	CVX-RICO-4343049		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
680	3/28/2006	Email from Ben Ortiz, Subject: Donzinger and Sacha Sur Video	CVX-RICO-4565126 CVX-RICO-4565128		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
681	7/2/2007	Email from C. Gidez Subject: DOW Jones-Chevron Texaco Alleges Irregularities in Ecuador Amazon Trial	CVX-RICO-4923675 - 676		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
682	11/14/2007	Email from S. Mcmillen Subject: Amazon Watch Press Release on Cofan Suit	CVX-RICO-4971094 - 1096		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
683	2/15/2010	Email from J. Craig Subject: hola & pregunta	CVX-RICO-4371426 - 1428		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
684		INTENTIONALLY LEFT BLANK			[Withdrawn]
685	3/26/2009	Email W. Irwin Subject: Response language for Crude	CVX-RICO-4875276- CVX-RICO-4875279	X	Chevron preserves its objection of Inadmissible Hearsay (FRE 801/802/805)
686	9/17/2009	Email from T. Cullen Subject: Chevron	CVX-RICO-4355079 - CVX-RICO-4355082		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
687	12/3/2009	Email from Sara Mcmillen Subject: Media tour next week?	CVX-RICO-4718562 - CVX-RICO-4718565		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
688	12/12/2009	Singer Report: Building Relationships between NGO Groups and Chevron	CVX-RICO-4904783 - CVX-RICO-4904832	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
689	2/12/2010	Anson search results re: Zambraon	CVX-RICO-5524194 - CVX-RICO-5524264		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
690	3/3/2013	Email from S. Garrigo Subject: Rainforest Action Network	CVX-RICO-4877758 - CVX-RICO-4877761		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
691	4/29/2010	Email from S. Mcmillen Subject: FYI from ADC-What are they talking about now?	CVX-RICO-4868164- CVX-RICO-4868166		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
692	5/6/2010	Email from A. Neuman Subject: Medial clips re: Ecuador-Chevron wins "Crude case in NYC"	CVX-RICO-5517973-CVX-RICO-5517978		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
693	5/6/2010	Email from P. Briz Subject: Plaintiffs' letter May 6, 2010	CVX-RICO-5536415-CVX-RICO-5536419		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
694	6/4/2010	Anson report on Plaintiff's protest of CVX	CVX-RICO-5592733		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
695	8/2/2010	Anson email to Neuman re: M. Cuddehe article (email redacted)	CVX-RICO-5549371-CVX-RICO-5549374		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
696	8/17/2010	Redacted email w/ Amy Goodman interview w/ Cuddehe	CVX-RICO-5516189-CVX-RICO-5516208		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
697	8/18/2010	Redacted email from Anson re: S. Singer media clips	CVX-RICO-5517509-CVX-RICO-5517523		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
698	10/25/2010	Email from J. Higgs Subject: AW-Former CVX/TEX worker in Ecuador: We dumped pollution into Rainforest	CVX-RICO-5518483-CVX-RICO-5518485		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
699	5/16/2011	Email from S. Anson Subject: Move our call today?	CVX-RICO-5501021-CVX-RICO-5501023		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
700	8/15/2011	The Red Line: Chvron's secret wars	CVX-RICO-5493266		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
701	3/17/2011	Kroll LexisNexis search for Donziger	CVX-RICO-5918345- CVX-RICO-5918390		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
702	5/1/2012	Kroll email re: phone call tracking	CVX-RICO-5566501- CVX_RICO_5566503		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
703	10/28/2009	Email from J. Craig Subject: chevron and ecuador	5 pages		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
704	12/20/2011	Jones Day letter to Prosecutor General of Ecuador	11 pages		Failure to timely produce (FRCP 26)
705	7/5/2012	Chevron letter to Fiscalia General	15 pages		Incomplete or No Translation Provided; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document
706	1/11/2010	"Review on effects of exposure to spilled lils on human health	11 pages		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
707	4/1/2005	IJOEH Article: Texaco and its Consultants	4 pages		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
708	11/17/2003	Oil exploitation in the Amazon basin of Ecuador: a public health emergency by Miguel San Sebastian and Anna-Karin Hurtig	7 pages		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
709	2004	Incidence of Childhood Leukemia and Oil Exploitation in the Amazon Basin of Ecuador by Anna-Karin Hurtig and Miguel San Sebastian	6 pages		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
710	11/20/2002	Geographical differences in cancer incidence in the Amazon basin of Ecuador in relation to residence near oil fields by Hurtig and San Sebastian	9 pages		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
711	10/10/2001	Gynecologic and breast malignancies in the Amazon basin of Ecuador 1985-1998 by Hurtig and San Sebastian	3 pages		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
712	2000	Informe yana curi by San Sebastian	63 pages		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
713	2002	Outcomes of Pregnancy among Women Living in the Proximity of Oil Fields in the Amazon Basin of Ecuador by Miguel San Sebastian	8 pages		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
714	2001	La salud de mujeres que viven cerca de pozos y estaciones de petroleo en al Amazonia ecuatoriana	10 pages		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
715	2001	Exposures and cancer incidence near oil fields in the Amazon basin of Ecuador by M. San Sebastian	7 pages		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
716	1998	Association of petrochemical exposure with spontaneous abortion by Xiping Xu	7 pages		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
717	11/2/2004	Calmbacher Email	CVX-RICO-2342636		Rule of Completeness (FRE 106); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
718	1/27/2005	Calmbacher Email	CVX-RICO-2342807 - 810		Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
719	1/27/2005	Calmbacher Email	CVX-RICO-2342811 - 815		Incomplete or No Translation Provided; Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
720	2/1/2005	Calmbacher Email	CVX-RICO-2343214		Incomplete or No Translation Provided; Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
721	2/1/2005	Calmbacher Email	CVX-RICO-2342816 - 817		Incomplete or No Translation Provided; Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
722	2/1/2005	Edison Camino Email	CVX-RICO-1328742 - 8743		Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
723	4/16/2006	Email from D. Fisher Subject: excellent work on remediation/questions	AMPI00018101-105		Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
724	2/1/2005	Donziger email	CVX-RICO-2317468		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
725	3/3/2005	Calmbacher Email	CVX-RICO-2342827 - 2828		Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
726	3/7/2005	Edison Camino Email	CVX-RICO-2342834		Incomplete or No Translation Provided; Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
727	3/11/2005	Calmbacher Email	CVX-RICO-2342835 - 2836		Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Original document for translation not provided
728	12/15/2004	Calmbacher Email	CVX-RICO-1334071 - 4075		Incomplete or No Translation Provided; Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
729	11/12/2005	Email from D. Russell to S. Mcmillen Subject Forgot the attachment	CVX-RICO-5040594		No Objections
730	2/1/2005	Russell Email	CVX-RICO-1332393		No Objections

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
730	4/16/2006	Email from D. Fisher Subject: excellent work on remediation/questions	AMPI00018101-105		This exhibit was withdrawn and replaced by current DX 730.
731	4/16/2006	Email from S. Donziger Subject excellent work on remediation/questions	4 pages		Inadmissible Hearsay (FRE 801/802/805)
732	6/13/2007	Email from D. Russell Subject: A corporate shield	CVX-RICO-4547355		No Objections
733	8/15/2006	Email from D. Russell Subject: Re: I asked you once...	CVX-RICO-4793564- CVX-RICO-4793567		No Objections
734	5/6/2008	Email from D. Russell Subject: belated thanks	CVX-RICO-5040975		No Objections
735	5/5/2009	Email from D. Russell Subject: A thought	CVX-RICO-4544583		No Objections
736	1/24/2006	Email from B. Powers Subject: Role of Mark Quarles and Nathalie W.	CVX-RICO1544187- CVX-RICO-1544189; Woods-HDD-0082879- Woods-HDD-0082881		Inadmissible Hearsay (FRE 801/802/805)
737	2/12/2006	Email from B. Powers subject: we need a conference call--possible today	CVX-RICO-1544565 - 4567		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
738	2/13/2006	Email from L. Lopez Subject: Cease and Desist! (from Dave Russell)	Donz-HDD-0080674; CVX-RICO-1357335		Inadmissible Hearsay (FRE 801/802/805)
739	2/13/2006	Email from S. Donziger Subject: How to explain 20 billion damage figure	CVX-RICO-2369288- CVX-RICO-2369290		Inadmissible Hearsay (FRE 801/802/805)
740	2/15/2006	Email from A. Maest Subject: Russell back off cost estimate-important	Woods-HDD-0084217; CVX-RICO-1545454		Relevance (FRE 401/402); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
741	5/6/2008	Email from D. Russell to S. McMillen re belated thanks	CVX-RICO-5040975- CVX-RICO-5040976	X	The parties agreed that this document is DX 741. No other objections.
741A	2/16/2006	Email from S. Donziger Subject: Dave Russell--importante y nuevo	CVX-RICO-2369356- CVX-RICO-2369358		The parties agreed that this document is DX 741A, and Chevron has the following objections: Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
742	2/15/2006	Email from S. Donziger: Subject Dave Russell--importante y nuevo	CVX-RICO-2369319- CVX-RICO-2369320		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
743	2/15/2006	Email from S. Donziger: Subject Re: Russell backing off cost estimate-important	CVX-RICO-2369333		Inadmissible Hearsay (FRE 801/802/805)
744	2/16/2006	Email from S. Donziger Subject: My response to Russell	CVX-RICO-2369364		Inadmissible Hearsay (FRE 801/802/805)
745	2/16/2006	Email from D. Russell Subject: Re: Response to your request	Donz-HDD-0080579; CVX-RICO-1357241		Inadmissible Hearsay (FRE 801/802/805)
746	2/21/2006	Email from B. Powers Subject: phone call Re: very quick question/fausto report/phone call	Woods-HDD-0082993- Woods-HDD-0082994; CVX-RICO-1544301- CVX-RICO-1544302		Inadmissible Hearsay (FRE 801/802/805)
747	2/21/2006	Email from B. Powers re: Fausto report accuracy	Woods-HDD-0083933- Woods-HDD_0083935; CVX-RICO1545177- CVX_RICO-1545179		Inadmissible Hearsay (FRE 801/802/805)
748	2/21/2006	Email from L. Lopez Subject: Re: Tues call? And Russell:	Donz-HDD-0080594- Donz-HDD-0080595; CVX-RICO-1357256- CVX-RICO-1357257		Inadmissible Hearsay (FRE 801/802/805)
749	2/22/2006	Email from S. Donziger Subject: Russell report messaging	CVX-RICO-2369384- CVX-RICO-2369385		Inadmissible Hearsay (FRE 801/802/805)
750	2/24/2006	Email from B. Powers Subject: Re: Urgent	CVX-RICO-1544310		Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
751	2/28/2006	Email from D. Fisher Subject: Re: Photos/Images of San Carlos	3 pages		Inadmissible Hearsay (FRE 801/802/805)
752	4/18/2006	Email from A. Page Subject: Re: work update	AMPI00007271-73		No objections
753	4/17/2006	"The Cost of Remediating the Ofmer Texaco Concession an Order of Magnitude Estimate by Fausto Miguel Penafiel Villarreal	AMPI00013867-876		No objections, so long as not offered for the truth of the matter asserted
754	3/20/2007	Email from A. Maest	DONZ00042696		Inadmissible Hearsay (FRE 801/802/805)
755	6/29/2004	Email from W. Irwin Subject: AmCham	CVX-RICO-4379079		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
756	9/23/2004	Email from W. Irwin Subject: Ecuador	CVX-RICO-4382629 - 630		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
757	6/17/2009	Email from A. Watson Subject: City Brights: Zennie Abraham: CXV accuser paid \$200k to Ecuador court's economist	CVX-RICO-4867258	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
758	5/21/2009	Email from N. Cunningham Subject: Second call from Pete Romero	CVX-RICO-5014021-CVX-RICO-5014022	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
759	3/3/2010	Letter to Ambassador Sapiro and Under Sec Hormats for Economic, Energy and Ag affairs	CVX-RICO-4876662-CVX-RICO-4876663;	X	Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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760	7/8/2010	Email from K. Robertson Subject: RE: FW: Amazon Defense Coalition: CVX Drafts Fire from U.S. Council of Bishops, Sierra Club over Improper Ecuador Lobbying	CVX-RICO-4862898- CVX-RICO-4862901	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
761	10/22/2010	Memo to Bill Irwin re: Meeting with Assist Sec of State for W. Hemisphere Affairs A. Valenzuela re: Ecuador	CVX-RICO-4888873- CVX-RICO-4888876	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
762	1/26/2007	Email from C. Gidez Subject PR conference call	CVX-RICO-4860715- CVX-RICO-4860718		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
763	3/2/2007	Email from B. Ortiz Subject: Re: Vistazo magazine article against Texaco and CVX	CVX-RICO-4908045- CVX-RICO-4908048		No objections, so long as not offered for the truth of the matter asserted
764	4/4/2007	Email from B. Ortiz Subject: Vistazo magazine article against Texaco and Chevron	CVX-RICO-4908045- CVX-RICO-4908048		Chevron preserves its objection of Inadmissible Hearsay (FRE 801/802/805)
765	4/24/2007	Email from J. Anderson Subject: Havoc Release	CVX-RICO-5055106	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
766	7/2/2007	Email from C. Stewart Subject: RE: DJ-CVXTexaco Alleges Irregularities in Ecuador Amazon Trial	CVX-RICO-4967395- CVX-RICO-4967399	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
767	9/6/2007	Email from C. Gidez Subject: Re: Letter to The Guardian: The case against CVX is unfair	CVX-RICO-4949411- CVX-RICO-4949413	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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768	1/16/2008	Email from K. Robertson Subject: RE. Ecuador Meeting Tomorrow/public affairs activity	CVX-RICO-4858483-CVX-RICO-4858484	X	Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
769	4/28/2009	Email from S. Mcmillen subject: Post comments	CVX-RICO-4768126-CVX_RICO-4768129		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
770	10/14/2009	Memo John Watson meeting w/ Michael Froman, NSC Dep. Advisor for Int'l Economic and Development affairs	CVX-RICO-4899943-CVX-RICO-4899944	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
771	10/1/2009	The Kill Step-The American Lawyer	5 pages		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
772	11/21/2010	Email from K. Robertson Subject: Re: Emailing RICO press release	CVX-RICO-4771342-CVX-RICO-4771343		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
773	7/6/2007	Email from L. Barry Subject: FW: More on Gore/Ecuador	CVX-RICO-4968012-CVX-RICO-4968014	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
774	3/31/2008	Email from K. Robertson Subject: Re: CVX, Ecuador-Story published with CVX comments	CVX-RICO-4967800-CVX-RICO-4967805		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
775	5/29/2008	Email from C. Gidez Subject: RE: Approved: Statement to use for media calls re: shareholder Meeting	CVX-RICO-4930032-CVS-RICO-4930034	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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776	7/28/2008	Email from W. Irwin Subject: RE: Ecuador report from WDC	CVX-RICO-4882582- CVX-RICO-4882584	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
777	8/6/2008	Email from W. Irwin Subject: FW: Ecuador PR Team Weekly Call	CVX-RICO-5042471	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
778	8/13/2008	Email from L. Barry Subject: Fw: upadte on Ecuador	CVX-RICO-4876054	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
779	8/21/2008	Email from B. Pomper Subject: RE: Modified doc	CVX-RICO-5001300- CVX-RICO-5001301	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
780	10/14/2008	Memo from Sam Singer Re: Ecuador Communications Strategy	CVX-RICO-04746090- CVX-RICO-4746093		Chevron preserves its objection of Relevance (FRE 401/402) and Inadmissible Hearsay (FRE 801/802/805)
781	10/31/2008	Email from K. Robertson Subject: RE: Plaintiffs' new accusation	CVX-RICO-4766766- CVX-RICO-4766767		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
782	11/17/2008	Email from W. Irwin Subject: RE: Interview to Rep. McGovern in today's edition El Comercio	CVX-RICO-4892333- CVX-RICO-4892337	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
783	3/10/2009	Memo to Don Campbell, Kent Robertson Subject: Key Messaging/Likley Questions for 60 Minutes Interview	CVX-RICO--4365454- CVX-RICO-4365470		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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784	3/23/2009	Email from D. Samson Subject: FW: dvd update	CVX-RICO-4715658- CVX-RICO-4715660		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
785	5/4/2009	Email from S. Mcmillen Subject: RE: 60 Minutes Summary/Action Steps	CVX-RICO-4892530- CVX-RICO-4892532	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
786	5/7/2009	Email from L. Barry Subject: RE; Wash Times Editorial: Ecuador grabs for CVXs wallet	CVX-RICO-4944485- CVX-RICO-4944487	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
787	5/8/2009	Email from D. Campbell Subject: FW: CVX Online Monitoring: High-Alert-Carter Wood: "The Combine: Activists, Lawyers and Ecuador Attacking CVX"	CVX-RICO-4930719- CVX-RICO-4930723	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
788	6/17/2009	Email from S. Mcmillen Subject: RE: Media clips re: Ecuador	CVX-RICO-4752488- CVX-RICO-4752508		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
789	7/8/2009	Email from J. Higgs Subject: RE: CVX Online monitoring: Red-Flag Report-July 7, 2009	CVX-RICO-4700595- CVX-RICO-4700602		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
790	7/10/2009	Email from L. Barry Subject: Re: Michelle O'Neill	CVX-RICO-4985550	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
791	7/21/2008	Email from E. Scott Subject: FW: Ecuador: WDC update	CVX-RICO-4992575- CVX-RICO-4992576	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)

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792	9/29/2008	Robertson email	CVX-RICO-4866412 - 418	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
793	5/11/2009	Email from L. Menghetti Subject: RE: Your testimony May 14	CVX-RICO-4958640- CVX-RICO-4958642	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
794	1/11/2010	Email from L. Barry Subject: John's Schedule for Friday Coming Together	CVX-RICO-4975725	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
795	3/5/2010	Email from L. Barry Subject: RE: 3/5 Donnelly/Menghetti Call w/ Wynne Teel and team	CVX-RICO-4948847- CVX-RICO-4948852	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
796	3/19/2010	Email from I. Andino Subject: Presupuesto insertos folleto de remediacion	CVX-RICO-4362717		Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
797	3/29/2010	Email from S. Anson Subject: Media clips re: Ecuador	CVX-RICO-5531117- CVX-RICO-5531121		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
798	5/25/2010	Email from K. Robertson subject: RE: Ads for Oriente nupes	CVX-RICO-4361920- CVX-RICO-4361921		Incomplete or No Translation Provided; Stipulation as to Chevron advertising in Ecuador (Trial Tr. at 115:23-116:6); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
799	5/27/2010	Email from T. McLarty Subject: RE: Possible visit to Quito by Secretary Hillary Clinton	CVX-RICO-4970790- CVX-RICO-4970791	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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800	6/3/2010	Email from S. Anson Subject: RE: Per Richard	CVX-RICO-5593669- CVX-RICO-5593671		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
801	8/9/2010	Email from K. Robertson Subject: RE: Inquiry	CVX-RICO-4783806- CVX-RICO-4783809		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
802	8/10/2010	Email from D. Samson To: Zygocki, Rhonda Subect: Normal	CVX-RICO- 4788388- 391		Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
803	9/23/2010	Email from L. Barry Subject: FW: WSJ editorial	CVX-RICO-4930015- CVX-RICO-4930018	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
804	10/21/2010	Email from L. Barry Subject: FW: Phone Call with Governor Engler from NAM	CVX-RICO-4891193	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
805	10/27/2010	Email from R. Zygocki Subject: FE: Funds to the US Chamber	CVX-RICO-4860029	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
806	11/2/2010	Email from W. Irwin Subject: RE: Talking points document	CVX-RICO-4859494- CVX-RICO-4859496	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
807	11/2/2010	Talking points doc for Ed Scott	CVX-RICO-4969925- CVX-RICO-4969926	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)

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808	3/28/2006	Email from B. Ortiz Subject: Donziger and Sacha Sur Video	CVX-RICO-4565126-CVX-RICO-4565128		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
809	1/5/2011	Email from D. Samson Subject: GQ Magazine	CVX-RICO-4937254		Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
810	1/13/2011	Email from L. Avram Subject: RE: answer for JSW town hall	CVX-RICO-4702893-CV-RICO-4702895		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
811	1/19/2011	Email from S. Mcmillen Subject: RE: Goldhaber questions:	CVX-RICO-4735394		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
812	1/20/2011	Email from K. Robertson Subject: Re: Query for reply to plaintiffs letter	CVX-RICO-4755874 - 5881		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
813	1/25/2011	Email from K. Robertson Subject: Re: re my deferred response to letter	CVX-RICO-4728927 - 931		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
814	3/8/2012	Winston & Strawn letter to Tribunal Re: Chevron Corp and Texaco Petro Co. v. the Republic of Ecuador	CVX-RICO-9127530 - 532		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
815	3/12/2012	King and Spalding letter to Tribunal Re: Chevron Corp and Texaco Petro Co v. the Republic of Ecuador	CVX-RICO-9127543 - 546		Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)

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816	3/15/2012	King and Spalding letter to Tribunal Re: Chevron Corp and Texaco Petro Co v. the Republic of Ecuador	CVX-RICO-9106438 - 6440		Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
817	3/15/2012	Winston & Strawn letter to Tribunal Re: Chevron Corp and Texaco Petro Co. v. the Republic of ecuador	CVX-RICO-9127577 - 7580		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
818	4/23/2012	Winston & Strawn letter to Tribunal Re: Chevron Corp and Texaco Petro Co. v. the Republic of ecuador	CVX-RICO-9127758- CVX-RICO-9127760		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
819	5/1/2012	King and Spalding letter to Tribunal Re: Chevron Corp and Texaco Petro Co v. the Republic of Ecuador	CVX-RICO-9123735 - 3740		Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
820	5/2/2012	Winston & Strawn letter to Tribunal Re: Chevron Corp and Texaco Petro Co. v. the Republic of ecuador	CVX-RICO-9127763 - 7764		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
821	5/21/2012	Winston & Strawn letter to Tribunal Re: Chevron Corp and Texaco Petro Co. v. the Republic of ecuador	CVX-RICO-9127773 - 7850		Best evidence rule (FRE 1002); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
822	5/21/2012	Letter from Calman Cohen to D. Bell Assistant US Trade Rep for Trade Policy & Economics	DONZ-EXS-000100-102		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
823	5/22/2012	Comments by Embassy of ROE to USA Office of US Trade Representative	DONZ-EXS-000103-121		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
824	5/22/2012	Letter from Jessica Lemos of National Association of Manufacturers	DONZ-EXS-000122-123		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
825	5/22/2012	Letter from National Foreign Trade Counsel to B. Harman	DONZ-EXS-000124		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
826	5/22/2012	Letter from US Chamber of Commerce to B. Harmon	DONZ-EXS-000125-126		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
827	6/11/2012	King and Spalding letter to Tribunal Re: Chevron Corp and Texaco Petro Co v. the Republic of Ecuador	CVX-RICO-9124495-501		Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
828	7/18/2012	Letter from Senator Richard Lugar to Ambassador Ron Kirk	DONZ-EXS-000151		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
829		INTENTIONALLY LEFT BLANK			[Withdrawn]
830		INTENTIONALLY LEFT BLANK			[Withdrawn]
831		INTENTIONALLY LEFT BLANK			[Withdrawn]
832		INTENTIONALLY LEFT BLANK			[Withdrawn]
833		INTENTIONALLY LEFT BLANK			[Withdrawn]
834		INTENTIONALLY LEFT BLANK			[Withdrawn]
835		INTENTIONALLY LEFT BLANK			[Withdrawn]
836		INTENTIONALLY LEFT BLANK			[Withdrawn]
837		INTENTIONALLY LEFT BLANK			[Withdrawn]
838		INTENTIONALLY LEFT BLANK			[Withdrawn]
839		INTENTIONALLY LEFT BLANK			[Withdrawn]
840		INTENTIONALLY LEFT BLANK			[Withdrawn]
841		INTENTIONALLY LEFT BLANK			[Withdrawn]
842		INTENTIONALLY LEFT BLANK			[Withdrawn]

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
843		INTENTIONALLY LEFT BLANK			[Withdrawn]
844		INTENTIONALLY LEFT BLANK			[Withdrawn]
845		INTENTIONALLY LEFT BLANK			[Withdrawn]
846		INTENTIONALLY LEFT BLANK			[Withdrawn]
847		INTENTIONALLY LEFT BLANK			[Withdrawn]
848		INTENTIONALLY LEFT BLANK			[Withdrawn]
849		INTENTIONALLY LEFT BLANK			[Withdrawn]
850		INTENTIONALLY LEFT BLANK			[Withdrawn]
851		INTENTIONALLY LEFT BLANK			[Withdrawn]
852		INTENTIONALLY LEFT BLANK			[Withdrawn]
853		INTENTIONALLY LEFT BLANK			[Withdrawn]
854		INTENTIONALLY LEFT BLANK			[Withdrawn]
855		INTENTIONALLY LEFT BLANK			[Withdrawn]
856		INTENTIONALLY LEFT BLANK			[Withdrawn]
857		INTENTIONALLY LEFT BLANK			[Withdrawn]
858		INTENTIONALLY LEFT BLANK			[Withdrawn]

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
859		INTENTIONALLY LEFT BLANK			[Withdrawn]
860		INTENTIONALLY LEFT BLANK			[Withdrawn]
861		INTENTIONALLY LEFT BLANK			[Withdrawn]
862		INTENTIONALLY LEFT BLANK			[Withdrawn]
863		INTENTIONALLY LEFT BLANK			[Withdrawn]
864		INTENTIONALLY LEFT BLANK			[Withdrawn]
865		INTENTIONALLY LEFT BLANK			[Withdrawn]
866		INTENTIONALLY LEFT BLANK			[Withdrawn]
867		INTENTIONALLY LEFT BLANK			[Withdrawn]
868		INTENTIONALLY LEFT BLANK			[Withdrawn]
869		INTENTIONALLY LEFT BLANK			[Withdrawn]
870		Chevron motion to Lago Agrio Court	CVX-RICO-4381053 - 054		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
871	7/30/2007	Chevron Press Release	DONZ-EXS-00096		No Objections
872	11/24/2007	Chevron Press Release	DONZ-EXS-00097		No Objections

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
873	8/24/2009	Munoz Cover Letter to Auca Report	CVX-RICO-4622439		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
874	8/24/2009	Munoz Cover Letter to Follow-up Report	CVX-RICO-4622405		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
875	9/26/2010	Fajardo Email	DONZ00059605		Inadmissible Hearsay (FRE 801/802/805)
876	10/1/2010	Email chain	DONZ00059725; DONZ00059727; DONZ00059732		Inadmissible Hearsay (FRE 801/802/805)
877	10/12/2010	Email chain	DONZ00059936		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
878	11/8/2010	Alberto Guerra email	CVX-RICO-0510900-02		No Objections
879	7/13/2012	Meeting of Guerra and Rivero and Investigator	CVX-RICO-5916723-815		Based upon the parties' agreement, DX 879 has been withdrawn and should be marked "INTENTIONALLY LEFT BLANK," but Defendants have left this exhibit listed on their exhibit list. No electronic version of this exhibit appears on the hard drive produced by Defendants on November 25, 2013.
880	7/31/2012	Meeting of Guerra and Rivero and Investigator	CVX-RICO-5916816-855		No objection (Cross Exhibit)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
881	2/11/2013	CVX Letter to Smyser			Best evidence rule (FRE 1002); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26)
882	2/21/2006	Donziger email	CVX-RICO-2293607-609		Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
883	7/17/2006	Ponce Villacis email	CVX-RICO-2688619 - 620		Inadmissible Hearsay (FRE 801/802/805)
884	7/17/2006	Donziger email	CVX-RICO-2688615-616		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
885	7/17/2006	Donziger email	CVX-RICO-1358261-262		Inadmissible Hearsay (FRE 801/802/805)
886	8/18/2006	Donziger email	CVX-RICO-2345779		Inadmissible Hearsay (FRE 801/802/805)
887	3/2/2007	Donziger email	CVX-RICO-2335197-5200		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
888	2/27/2006	Donziger email	CVX-RICO-1544315		Inadmissible Hearsay (FRE 801/802/805)
889	3/4/2006	Fajardo, Wray, SRD email	CVX-RICO-1544634 - 635		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
890	6/19/2006	Donziger email	CVX-RICO-6000582 - 583		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
891	8/22/2006	Fajardo email re ATENCION - NOVEDAD			Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
892	8/25/2006	Prieto email	CVX-RICO-1360038 - 0040		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
893	8/25/2006	Yanza email	CVX-RICO-1360430 - 432		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
894	6/23/2005	Donziger-Garrigo email	CVX-RICO-4560761-763		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
895	2/27/2006	Donziger email(5 PAGES)	CVX-RICO-1544315		Inadmissible Hearsay (FRE 801/802/805)
896	7/3/2006	Fajardo et al email chain(5 PAGES)	CVX-RICO-2344631		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
897	12/16/2010	Fajardo et al email chain	CVX-RICO-0510933 - 935		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
898	12/29/2010	Fajardo et al email chain(2 PAGES)	CVX-RICO-1848278		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
899	12/31/2010	Fajardo et al email chain	CVX-RICO-0510941-943		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
900	1/8/2011	Fajardo et al email chain	CVX-RICO-0509631-35		Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
901	1991	Judith Kimerling, Amazon Crude			Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
902	2/18/2013	Track 2 Counter-Memorial On The Merits Of the Republic of Ecuador Annexes A-H		X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26); Not Evidence; Annex C and Annex E of DX 902 should be treated as "Confidential" and submitted under seal
903		INTENTIONALLY LEFT BLANK			[Withdrawn]
903A		Collected Affidavits (46 pages)			Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
903B	2006	UN Chronicle Article (3 pages)			Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
903C	2006	Leadro UN Report	E/CN.4/2006/52/Add.2		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
903D	9/8/2008	Carter Center Release			Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
903E	9/30/2007	Ecuador Carter Center Electoral Report (17 pages)			Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
903F	9/28/2008	Ecuador Referendum Report (16 pages)			Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
903G	11/29/2011	Transparency International Corruption Perception Methodology (26 pages)			Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
903H	10/30/2008	Annex A - Ecuador Selects New High Court Judges By Lottery, Jurist (1 page)			Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
903I	1/14/2009	Annex A - Obama, Biden to Visit Supreme Court Wednesday, Associated Press (2 pages)			Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
903J	10/12/2013	Annex A - Organization of American States, Secretariat for Political Affairs, Political Missions Map (1 pg)			Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
904	2/18/2013	Annex regarding criminal proceedings against Chevron in Ecuador	Annex B to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26) ; Not Evidence

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
905	2/18/2013	Annex regarding alleged bribery plot targeting Judge Nunez	Annex C to Track 2 Counter-Memorial	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26); Not Evidence; Document should be treated as "Confidential" and submitted under seal
906	2/18/2013	Annex regarding allegations that Lago Agrio judgment was ghostwritten by plaintiffs	Annex D to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26) ; Not Evidence
906A		R-182	Annex D to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Improper Summary Exhibit (FRE 1006); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Incomplete or Inaccurate Description or Document

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
906B		R-530, English and Spanish	Annex D to Track 2 Counter-Memorial		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Incomplete or Inaccurate Description or Document
906C		R-656	Annex D to Track 2 Counter-Memorial		Relevance (FRE 401/402); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Incomplete or Inaccurate Description or Document
906D		R-657	Annex D to Track 2 Counter-Memorial		Relevance (FRE 401/402); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Incomplete or Inaccurate Description or Document
906E		R-658	Annex D to Track 2 Counter-Memorial		Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
906F		R-660	Annex D to Track 2 Counter-Memorial 140.787-814		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Incomplete or Inaccurate Description or Document
906G		R-664, English and Spanish	Annex D to Track 2 Counter-Memorial 151.470-71		Incomplete or No Translation Provided; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Incomplete or Inaccurate Description or Document
906H		R-665, English and Spanish	Annex D to Track 2 Counter-Memorial 11.992-12.026		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
906I		R-666, English and Spanish	Annex D to Track 2 Counter-Memorial 12.047		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Incomplete or Inaccurate Description or Document
906J		R-667	Annex D to Track 2 Counter-Memorial 92.686-688; 114.081-085		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Incomplete or Inaccurate Description or Document
906K		R-668, English and Spanish	Annex D to Track 2 Counter-Memorial 151.454-456		Incomplete or No Translation Provided; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Incomplete or Inaccurate Description or Document

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
906L		R-669	Annex D to Track 2 Counter-Memorial 140.716-786		Incomplete or No Translation Provided; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Incomplete or Inaccurate Description or Document
906M		R-670	Annex D to Track 2 Counter-Memorial 155.734-737, 92.686-688		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Incomplete or Inaccurate Description or Document
906N		R-671	Annex D to Track 2 Counter-Memorial 139.080-093		Incomplete or No Translation Provided; Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Incomplete or Inaccurate Description or Document
906O		R-832	Annex D to Track 2 Counter-Memorial DONZ00041928		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Incomplete or Inaccurate Description or Document

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
906P		R-836, English and Spanish	Annex D to Track 2 Counter-Memorial 184.491-576; 184.395-486		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Incomplete or Inaccurate Description or Document
906Q		R-838	Annex D to Track 2 Counter-Memorial 43.577-597		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Incomplete or Inaccurate Description or Document
907	2/18/2013	Annex regarding expert reports by Dr. Calmbacher and Mr. Cabrera	Annex E to Track 2 Counter-Memorial	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26); Not Evidence; Document should be treated as "Confidential" and submitted under seal

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
908	2/18/2013	Annex regarding allegations of collusion	Annex F to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26) ; Not Evidence
909	2/18/2013	Annex regarding allegations of legal error	Annex G to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26) ; Not Evidence
910	Undated	A Study of State Judicial Discipline Sanctions by Cynthia Gray	Ex R-603 to Track 2 Counter-Memorial		Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
911	6/6/2008	Lago Agrio Record, Cuerpo 1308 at 140701 ("Protocolizacion" attaching Fusion Memo exhibits)	Ex R-530 to Track 2 Counter-Memorial		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
912		INTENTIONALLY LEFT BLANK			[Withdrawn]

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
913	9/5/2009	Under Pressure Ecuadorean Judge Steps Aside in Suit Against Chevron, NEW YORK TIMES (Sept. 5, 2009)	Ex R-315 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
914	9/5/2009	Chevron's Legal Fireworks, LOS ANGELES TIMES (Sept. 5, 2009)	Ex R-316 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
915	9/2/2009	Chevron Judge Says Tapes Don't Reveal Verdict, SAN FRANCISCO CHRONICLE (Sept. 2, 2009)	Ex R-317 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
916	9/1/2009	Chevron Steps Up Ecuador Legal Fight, FINANCIAL TIMES at 2 (Sept. 1, 2009)	Ex R-470 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
917		INTENTIONALLY LEFT BLANK			[Withdrawn]

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
918	12/2012	Chevron Paid \$2.2 Million To Man Who Threatened To Expose Company's Corruption in Ecuador, BCLC	Ex R-471 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
919	NA	H. David Thurston, Slash/Mulch Systems: Neglected Sustainable Tropical Agroecosystems	Ex R-474 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
920	5/26/2006	Defendants' Amended Motion to Dismiss Complaint or, in the Alternative, to Stay (May 25, 2006)	Ex R-7 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
921	1/26/1996	Sworn Statement of Luis Arturo Araujo (Jan. 26, 1996)	Ex R-8 to Track 2 Counter-Memorial		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
922	12/19/2006	Excerpts from Dep. of Edmundo Brown (Dec. 19, 2006)	Ex R-9 to Track 2 Counter-Memorial		Violates pretrial order re: proper format for deposition designations (Judge Kaplan Individual Rules and Practices at 8); Rule of Completeness (FRE 106); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
923	11/12/1984	Telex from Sawyer to Coral Gables (Nov. 12, 1984)	Ex R-428 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
924	12/13/1984	Memorandum from Yates to De Crane (Dec. 13, 1984)	Ex R-429 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
925	2/18/2013	Letter from J. Donald Annett, President of Health and Safety Division of Texaco Inc. to S. Jacob Scherr, Director, International Program, of NRDC (Dec. 27, 1990)	Ex R-476 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
926	2/18/2013	Owen L. Anderson Aff. (Feb. 23, 2005)	Ex R-421 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
927		INTENTIONALLY LEFT BLANK			[Withdrawn]
928	2/18/2013	Letter to Bates (Feb. 22, 1983)	Ex R-432 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
929	2/18/2013	May 27, 1988 letter from Sawyer to Black	Ex R-433 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
930	2/18/2013	O. Anderson Deposition Transcript	Ex R-435 to Track 2 Counter-Memorial		Violates pretrial order re: proper format for deposition designations (Judge Kaplan Individual Rules and Practices at 8); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
931	2/18/2013	Sawyer Deposition Transcript	Ex R-436 to Track 2 Counter-Memorial		Violates pretrial order re: proper format for deposition designations (Judge Kaplan Individual Rules and Practices at 8); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
932		INTENTIONALLY LEFT BLANK			[Withdrawn]

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
933	2/18/2013	Bischoff Resp re Latin American Exploration (1980)	Ex R-847 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
934	2/18/2013	Center for Health and the Global Environment, Harvard Medical School, Oil: A Life Cycle Analysis of its Health and Environmental Impacts (eds. Paul R. Epstein and Jesse Selber March 2002)	Ex R-483 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
935	2/18/2013	Carlos A. Quiroz, Responses to Specific Charges (Nov. 20, 1990)	Ex R-484 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
936	2/18/2013	Natural Resources Defense Council's Environmental Allegations	Ex R-500 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
937	2/18/2013	Texaco Petroleum Company, Environmental Protection – Ecuador's Operations (May 11, 1990)	Ex R-485 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
938		INTENTIONALLY LEFT BLANK			[Withdrawn]
939	2/18/2013	Center for Disease Control - Hexavalent Chromium	Ex R-488 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
940	2/18/2013	Memo from U.V. Henderson, et al. to W.C. Benton re "Environmental Assessment-Consortium Operations in Ecuador" (Nov. 14, 1990)	Ex R-489 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
941	2/18/2013	D.R. King and C.A. Quiroz, The Trans-Ecuadorean Pipeline (1986)	Ex R-492 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
942	2/18/2013	Questions on Texaco's Environmental and Other Operations (Oct. 24, 1990)	Ex R-493 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
943	2/18/2013	Letter from J. Donald Annett, President of Health and Safety Division of Texaco Inc. to S. Jacob Scherr, Director, International Program, of NRDC (Dec. 27, 1990)	Ex R-476 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
944		INTENTIONALLY LEFT BLANK			[Withdrawn]
945	2/18/2013	U.S. Patent Number 3,817,859 (June 18, 1974)	Ex R-529 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
946	2/18/2013	Contract of Environmental Investigation Services for Oil Fields of the CEPE-Texaco Consortium among PetroEcuador, Texaco Petroleum Company, and HBT-Agra Limited (May 1992)	Ex R-176 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
947	2/18/2013	CARLOS BERISTAIN, WORDS FROM THE RAINFOREST: PSYCHOSOCIAL STUDY OF THE IMPACT OF TEXACO'S OIL OPERATIONS ON THE AMAZONIAN COMMUNITIES OF ECUADOR 13 (2009)	Ex R-545 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
948		INTENTIONALLY LEFT BLANK			[Withdrawn]
949		INTENTIONALLY LEFT BLANK			[Withdrawn]
950	11/4/2005	Connor Expert Report, Judicial Inspection of Sacha Central Station (Nov. 4, 2005)	Ex R-494 to Track 2 Counter-Memorial 83.274 - 372		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
951	1/7/1998	Brief for Defendant-Appellee [Texaco] (Jan. 7, 1998)	Ex R-21 to Track 2 Counter-Memorial		Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26) ; Not Evidence

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
952	11/3/1993	Complaint, Aguinda v. Texaco, Inc., Case No. 93-Civ-7527 (S.D.N.Y.)	Ex C-14 to Track 2 Counter-Memorial		Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
953	12/8/1993	Fax from Kostiw to LeCorgne (Dec. 8, 1993)	Ex R-26 to Track 2 Counter-Memorial CA1074965		Objection sustained; Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
954	8/19/2002	ChevronTexaco Issues Statement on U.S. Circuit Court Decision Affirming Dismissal of Ecuador Litigation, ChevronTexaco Press Release (Aug. 19, 2002)	Ex R-41 to Track 2 Counter-Memorial CA3010948		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
955	5/7/2003	Lago Agrio Complaint	Ex C-71 to Track 2 Counter-Memorial		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
956	2/6/2007	Supplemental Declaration of Dr. Alejandro Ponce-Villacis (Feb. 6, 2007)	Ex R-57 to Track 2 Counter-Memorial		Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
957		Chevron Answer to Lago Agrio Complaint	Ex C-72 to Track 2 Counter-Memorial CL0003-0000243; 243-267		Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
958	10/18/2005	Excerpt from Lago Agrio Record (Chevron's letter to the Court (Oct. 18, 2005) requesting the suspension of the judicial inspection in El Guanta).	Ex R-475 to Track 2 Counter-Memorial 81.426		No objections, so long as not offered for the truth of the matter asserted
959	10/18/2005	Excerpt from Lago Agrio Record (Intelligence Report signed by Major Arturo Velasco (Oct. 18, 2005))	Ex R-477 to Track 2 Counter-Memorial 81, 410		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
960		INTENTIONALLY LEFT BLANK			[Withdrawn]
961	2/8/2006	Excerpt from Lago Agrio Record (Report signed by Sr. Coronel Miguel Fuentes Ruiz (Feb. 8, 2006))	Ex R-479 to Track 2 Counter-Memorial 93.031-037		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
962		INTENTIONALLY LEFT BLANK			[Withdrawn]
963		INTENTIONALLY LEFT BLANK			[Withdrawn]
964		INTENTIONALLY LEFT BLANK			[Withdrawn]
965	12/10/2009	Excerpt from Lago Agrio Record (Acta of Appointment of Experts (Dec. 10, 2009))	Ex R-480 to Track 2 Counter-Memorial 159.708		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321; Trial Tr. at 82:20-22; 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
966	12/15/2009	Excerpt from Lago Agrio Record (Work Activities and Schedule submitted by Eng. José López (December 15, 2009))	Ex R-481 to Track 2 Counter-Memorial 159.802-822		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
967	1/5/2010	Excerpt from Lago Agrio Record (Court Order, Jan. 5, 2010))	Ex R-482 to Track 2 Counter-Memorial 164.366-369		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
968	1/8/2010	Excerpt from Lago Agrio Record (Chevron's Motion (Jan. 8, 2010))	Ex R-486 to Track 2 Counter-Memorial 163.373-74		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26)
969	1/19/2010	Excerpt from Lago Agrio Record (Court Order (Jan. 19, 2010))	Ex R-685 to Track 2 Counter-Memorial 165.394-396		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
970	1/25/2010	Excerpt from Lago Agrio Record (Chevron's Motion (Jan. 25, 2010))	Ex R-686 to Track 2 Counter-Memorial 165.427-436		Incomplete or No Translation Provided; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26)
971	2/2/2010	Excerpt from Lago Agrio Record (Court Order (Feb. 2, 2010))	Ex R-687 to Track 2 Counter-Memorial 165.936-939		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
972	2/22/2010	Excerpt from Lago Agrio Record (Chevron's Motion (Feb. 22, 2010))	Ex R-688 to Track 2 Counter-Memorial 167.967-971		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26)
973	3/23/2010	Excerpt from Lago Agrio Record (Court Order (Mar. 23, 2010))	Ex R-689 to Track 2 Counter-Memorial 168.517		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
974	3/24/2010	Excerpt from Lago Agrio Record (Chevron's Letter (Mar. 24, 2010))	Ex R-690 to Track 2 Counter-Memorial 168.535-536		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
975	3/30/2010	Excerpt from Lago Agrio Record (Letter submitted by Eng. José Lopéz (Mar. 30, 2010))	Ex R-691 to Track 2 Counter-Memorial 168.570-571		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
976	4/7/2010	Excerpt from Lago Agrio Record (Letter submitted by Eng. José Lopéz (Apr. 7, 2010))	Ex R-692 to Track 2 Counter-Memorial 168.618-619		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
977	4/9/2010	Excerpt from Lago Agrio Record (Chevron Letter (Apr. 9, 2010))	Ex R-693 to Track 2 Counter-Memorial 168.646-647		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26)
978	4/14/2010	Excerpt from Lago Agrio Record (Letter submitted by Eng. José Lopéz (Apr. 14, 2010))	Ex R-694 to Track 2 Counter-Memorial 168.678-680		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
979	6/3/2010	Excerpt from Lago Agrio Record (Letter submitted by Eng. Marcelo Muñoz (June 03, 2010))	Ex R-695 to Track 2 Counter-Memorial 184.161		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
980	10/29/2010	Excerpt from Lago Agrio Record (Letter submitted by Eng. Marcelo Muñoz (Oct. 29, 2010))	Ex R-696 to Track 2 Counter-Memorial 208.985-86		No Objections
981	10/11/2010	Excerpt from Lago Agrio Record (Court Order (Oct. 11, 2010))	Ex R-697 to Track 2 Counter-Memorial 208.726-28		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
982	12/16/2010	Excerpt from Lago Agrio Record (Court Order (Dec. 16, 2010))	Ex R-698 to Track 2 Counter-Memorial 211.685		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
983	1/27/2006	Motion from Pablo Fajardo Mendoza to the Superior Court of Nueva Loja (Jan. 27, 2006)	Ex C-188 to Track 2 Counter-Memorial 92.442-44		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
984	12/4/2006	Plaintiffs' Motion to the Lago Agrio Court (Dec. 4, 2006)	Ex C-189 to Track 2 Counter-Memorial 123.454-55		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
985	5/19/2007	Lago Agrio Court Order (Mar. 19, 2007)	Ex C-197 to Track 2 Counter-Memorial 127.044-045		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
986	8/5/2010	Excerpt from Lago Agrio Record (17 motions filed by Chevron on Aug. 5, 2010)	Ex R-699 to Track 2 Counter-Memorial 192.680-719		Incomplete or No Translation Provided; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
987	7/30/2010	Excerpt from Lago Agrio Record (Court Order (July 30, 2010))	Ex R-700 to Track 2 Counter-Memorial 190.491-92		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
988	10/19/2010	Excerpt from Lago Agrio Record (Court Order (Oct. 19, 2010) addressing Chevron's thirty nine motions.)	Ex C-644 to Track 2 Counter-Memorial		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
989	5/30/2007	Excerpt from Lago Agrio Record (Chevron's motion appealing a court resolution ordering the appointment of an expert (May 30, 2007))	Ex R-702 to Track 2 Counter-Memorial 129.958-966		Incomplete or No Translation Provided; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
990	6/7/2007	Excerpt from Lago Agrio Record (Court Order (Jun. 7, 2007) denying Chevron's appeal)	Ex R-704 to Track 2 Counter-Memorial 130.094-95		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
991	11/13/2009	Excerpt from Lago Agrio Record (Chevron's motion (Nov. 13, 2009) appealing the court order denying previous appeal and requesting the annulment of the proceedings)	Ex R-701 to Track 2 Counter-Memorial 159.234		Incomplete or No Translation Provided; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
992	1/23/2009	Excerpt from Lago Agrio Record (Court order (Nov. 23, 2009) denying Chevron's motion for annulment)	Ex R-538 to Track 2 Counter-Memorial 158.416-417		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
993	5/23/2007	Excerpt from Lago Agrio Record (Court Order (May 23, 2007))	Ex R-703 to Track 2 Counter-Memorial 129.934-935		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
994	12/20/2010	Chevron's Motion (Dec. 20, 2010)	Ex C-1181 to Track 2 Counter-Memorial (no foja numbers)		Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
995	8/26/2010	Chevron's Motion to Recuse Judge Ordoñez (Aug. 26, 2010)	Ex C-1289 to Track 2 Counter-Memorial (no foja numbers)		Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
996	9/30/2010	Order of the Provincial Court of Justice Sucumbios (Sept. 30, 2010)	Ex R-207 to Track 2 Counter-Memorial (no foja numbers)		No objections, so long as not offered for the truth of the matter asserted

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
997	8/13/2009	Sucumbíos Sanctions Decision (Aug. 13, 2009)	Ex C-219 to Track 2 Counter-Memorial 157.929-931		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
998	10/27/2010	Order by the Provincial Court of Sucumbíos (Oct. 27, 2010)	Ex C-878 to Track 2 Counter-Memorial (no foja numbers)		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
999	6/11/2010	Amazon Defense Coalition, Key Witness Testifies that Chevron Paid Bribes, Switched Soil Samples in \$27b Ecuador Lawsuit, PETROLEUMWORLD.COM (June 11, 2010)	Ex R-189 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1000	3/6/2012	Drew Hinshaw, Chevron Faces Fire in Nigeria, WALL STREET JOURNAL (Mar. 6, 2012)	Ex R-502 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1001	12/17/2012	Jeff Fick, Chevron Offers to Pay \$149 Million to Settle Two Brazil Spill Suits, WALL STREET JOURNAL (Dec. 17, 2012)	Ex R-503 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1002	9/17/2010	Jeff Fick, Brazil Agency Fines Chevron \$17.3 Million for Oil Spill, THE WALL STREET JOURNAL (Sept. 17, 2012)	Ex R-504 to Track 2 Counter-Memoiral		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1003	3/21/2012	Jeb Blount and Joshua Schneyer, Chevron, Transocean charged in Brazilian oil spill, REUTERS (Mar. 21, 2012)	Ex R-705 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1004	2/1/2012	2011 Chevron 10-K, FS-57 (filed February 2012)	Ex R-505 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1005	6/1/2010	U.S. Department of the Interior, Case Documents: Castro Cove, Richmond, CA	Ex R-506 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1006	3/25/2012	Lindsay Whitehurst, Residents sue Chevron for Red Butte Creek oil spill, THE SALT LAKE TRIBUNE (Mar. 25, 2012)	Ex R-507 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1007	9/7/2011	Attorney General Kamala D. Harris Press Announcement (Sept. 7, 2011)	Ex R-508 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1008	9/8/2011	Louis Sahagun, \$24.5-Million Settlement Proposed For Chevron, LA TIMES (Sept. 8, 2011)	Ex R-509 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1009	3/23/2011	Brittany Levine, Chevron To Pay \$3.1 Million Over Contamination, ORANGE COUNTY REGISTER (Mar. 23, 2011)	Ex R-510 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1010	2/18/2011	John Vidal, Why Chevron's Lawyers Must Be Among The Busiest In The World, THE GUARDIAN, Feb. 18, 2011.	Ex R-511 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1011	11/17/2007	Chevron To Pay \$30 Million To Settle Charges For Improper Payments To Iraq Under U.N. Oil For Food Program, SEC Press Release (Nov. 14, 2007)	Ex R-512 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1012	11/17/2007	United States Securities and Exchange Commission v. Chevron Corporation, Civil Complaint, Nov. 14, 2007 (S.D.N.Y.)	Ex R-513 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1013	1/5/2011	Recent Cases, Foreign Companies Dominate New Top Ten, The FCPA Blog (Jan. 5, 2011)	Ex R-514 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)

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1014	11/15/2007	Chevron To Pay \$30 Million To Settle Kickback Charges, NEW YORK TIMES (Nov. 15, 2007)	Ex R-515 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1015	9/11/2008	Charlie Savage, Sex, Drug Use and Graft Cited in Interior Department, NEW YORK TIMES (Sept. 11, 2008)	Ex R-516 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1016		INTENTIONALLY LEFT BLANK			[Withdrawn]
1017		INTENTIONALLY LEFT BLANK			[Withdrawn]
1018		INTENTIONALLY LEFT BLANK			[Withdrawn]
1019	9/1/2009	Earth Rights International, Total Impact: The Human Rights, Environmental, and Financial Impacts of Total and Chevron's Yadana Gas Project in Military-Ruled Burma (Myanmar) (Sept. 2009)	Ex R-520 to Track 2 Counter-Memorial		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1020	7/6/2010	Vivienne Walt, Chevron, Total Accused of Human-Rights Abuses in Burma, TIME (July 6, 2010)	Ex R-521 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1021		INTENTIONALLY LEFT BLANK			[Withdrawn]
1022	1/20/2012	Chevron's Cassation Appeal (English)	Ex C-1068 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Failure to timely produce (FRCP 26)
1023	1/28/2011	Kate Sheppard, Amazon Plaintiffs to Chevron: We're Real!, MOTHER JONES (Jan. 28, 2011)	Ex R-524 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1024	1/28/2011	Event in Amazon Jungle Puts Lie To Oil Giant's Latest Desperate Tactic, Chevron Toxico (Jan. 28, 2011)	Ex R-525 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1025		INTENTIONALLY LEFT BLANK			[Withdrawn]

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1026	7/28/2005	Email from C. Calmbacher to S. Donziger (Jul. 28, 2005)	Ex R-204 to Track 2 Counter-Memorial DONZ00031163		Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1027	11/4/2004	Email from C. Calmbacher to M. Pareja (Nov. 4, 2004)	Ex R-149 to Track 2 Counter-Memorial		Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1028	7/21/2006	Amicus Curiae Brief, filed in the Lago Agrio Litigation on July 21, 2006	Ex C-194 to Track 2 Counter-Memorial 116.436-441		No objections, so long as not offered for the truth of the matter asserted
1029	1/22/2007	Lago Agrio Court Order, Jan. 22, 2007	Ex C-196 to Track 2 Counter-Memorial 125.656-659		Inadmissible Hearsay (FRE 801/802/805)
1030	6/21/2010	Plaintiffs' Motion to the Lago Agrio Court, June 21, 2010	Ex C-382 to Track 2 Counter-Memorial (no foja number)		Inadmissible Hearsay (FRE 801/802/805)
1031	10/29/2003	Lago Agrio Court Order, Oct. 29, 2003	Ex C-176 to Track 2 Counter-Memorial (4681-4684)		Incomplete or No Translation Provided; Inadmissible Hearsay (FRE 801/802/805)
1032	10/29/2003	Lago Agrio Plaintiffs' Motion re Procedures for Evidence, Oct. 29, 2003	Ex C-494B to Track 2 Counter-Memorial (4677-4678)		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1033	2/7/2007	Email exchange between S. Donziger and A. Page, Feb. 7, 2007	Ex C-1264 to Track 2 Counter-Memorial DONZ-HDD-0100386		Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1034	2/18/2013	Email from P. Fajardo to S. Donziger, L. Yanza, J. Prieto, J.P. Saenz and A. Anchundia, March 26, 2007	Ex C-917 to Track 2 Counter-Memorial DONZ00042758		Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26); Inadmissible Hearsay (FRE 801/802/805)
1035		INTENTIONALLY LEFT BLANK			[Withdrawn]
1036	5/3/2010	Joel Achenbach and Anne E. Kornblut, Officials' Forecast Grim About Massive Oil Spill as ObamaTours Part of the Gulf Coast, WASHINGTON POST (May 3, 2010).	Ex R-537 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1037	8/10/2005	Email from M. Escobar to A. Wray, et al. (Aug. 10, 2005)	Ex C-166 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
1038	10/24/2007	Email from S. Donziger to E. Bloom and N. Mitchell (Oct. 24, 2007)	Ex C-797 to Track 2 Counter-Memorial DONZ00025298		Per the parties' agreement, this exhibit was broken down into DX 1038A, DX 1038B, and DX 1038C, and Chevron's objections appear below for these exhibits respectively.
1038A	10/24/2007	Email from Donziger to Leonard Subject: Procurador Meeting	DONZ00025298		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1038B	10/24/2007	Email from Mitchell to Bloom and Donziger Subject: Re: Important	DONZ00025302-3		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1038C	10/25/2007	Email from Mitchell to Donziger, Bloom, Subject: Procurador Meeting			Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1039		INTENTIONALLY LEFT BLANK			[Withdrawn]
1040	8/18/2008	Cooperation Agreement (Aug. 15. 2008)	Ex C-1135 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
1041	7/30/2007	Email from L. Belanger to S. Donziger (2007)	Ex R-540 to Track 2 Counter-Memorial		Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1042		INTENTIONALLY LEFT BLANK			[Withdrawn]
1043	9/3/2009	Kent Robertson Email	CVX-RICO-4369595 - 596		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1044	9/7/2009	Chris Gidez Email	CVX-RICO-4865687 - 689		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1045	6/9/2010	Transcript of Escobar Briefing at Ciespal	CVX-RICO-4364219 - 225		Incomplete or No Translation Provided; Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1046	11/24/2010	Nunez Interview	CVX-RICO-4381143 - 1153		Incomplete or No Translation Provided; Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1047	8/14/2009	Borja Chevron Payments to Borja	CVX-RICO-0000641 - 649		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
1048	8/31/2009	Borja Attorney Bills	CVX-RICO-0000343 - 366, 369 - 400		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1049		Borja Travel and Living Expenses	CVX-RICO-6014662 – 664, 666 - 672, 683 - 688, 691 - 699, 704 - 707, 716 - 727		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1050	10/5/2010	Borja Travel Expenses	CVX-RICO-0000476 – 477, 533 - 549		Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1051	4/1/1971	Texaco Summary of US Laws re Oil Spills	DONZ-EXS-00001		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
1052	7/17/1972	Shields Memo re Env. Reporting	DONZ-EXS-00009 ROEP00050105		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1053	8/10/1973	Texaco Fact Sheet re Env Practices	8 pages PET041548		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
1054	12/28/1973	Texaco Memo re Surge Tanks	1 page PET006824		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
1055	5/20/1974	Letters re Spill Cleanup Technologies	6 pages PET 041544 – 545, 540 - 543		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
1056	6/18/1974	Texaco Produced Water Patent (No 03817859)	3 pages (No Bates on Doc)		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1057	11/5/1975	Texaco Environmental Incident Reports	4 pages PET 041508 – 509, 512, 528		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
1058	3/19/1976	Texaco memo re contamination and DGH complaints	1 page PET 041499		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26); Failure to timely produce - Identified on prior list(s) but exhibit and/or exhibit version produced for first time on November 7, 2013 (FRCP 26)
1059	12/29/1977	Texaco Environmental Incident Reports	28 pages PET 041395 – 403, 405- 415, 417 – 424		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
1060	2/14/1978	Texaco memo re request to purchase filing cabinet	1 page PET number illegible		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1061	12/7/1979	Texaco memo re safe levels of crude in water	2 pages PET 041341-342		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
1062	1/18/1979	Texaco memo re request to purchase two calculators	1 page PET 035822		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
1063	5/30/1980	Texaco memo re environmental claims	17 pages CA 2183808 - 3824		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
1064	6/25/1980	Texaco memo re cost of switching to lined pits	2 pages CA 1024712 - 4713		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1065	11/22/1995	Declaration of Vargas Pazzos	12 pages		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
1066		INTENTIONALLY LEFT BLANK			[Withdrawn]
1067	10/29/2010	Letter to Lago Agrio Court filed by Marcelo Munoz	Dkt. 154-7		No Objections
1068	9/30/1998	1996 Letter from ROE	CVX-RICO-4373256		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1069		Study of Contamination	CVX-RICO-4358998 - 9010		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1070	10/24/2006	Chevron Powerpoint	CVX-RICO-4341899 - 1925		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1071	6/1/2006	2006 SA-20 pre-inspection Report	CVX-RICO-5086701 - 6704		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1072	4/1/2007	2007 SA-56 Site Summary Report	CVX-RICO-5090563 - 0567		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1073	6/17/2009	Beristain Speech	CVX-RICO-4389471 - 9484		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1074	6/17/2009	Breil Speech	CVX-RICO-4389467 - 9470		Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1075	5/11/2005	Bonifaz email	DONZ00026832		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1076	1/18/2006	CVX v. LAP Groundwater Sample Methods	CVX-RICO-1544494		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1077	1/20/2006	Mark Quarles email	CVX-RICO-1545097		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1078	2/12/2006	Bill Powers Email	CVX-RICO-1544565		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1079	2/25/2006	Ann Maest email	CVX-RICO-1545873		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1080	8/22/2008	Stratus Report: Phony Cleanup Memo	9 pages		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1081	8/22/2008	Stratus Report: Sample Differences Memo	5 pages		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1082		Stratus Report: Scientific Evidence in the Aguinda et al. v. Chevron Case	49 pages		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
1083	11/8/2007	Stratus Report: Environmental Summary Report	37 pages		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1084		Stratus Report: SSF38 Site Examination	24 pages		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1085	11/12/2007	Stratus Document: Three Site Contamination	86 pages		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1086		Stratus Report: Six Different Sets of Tests Show Contamination	4 pages		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1087	4/5/2011	Plaintiffs' appellate filing	Dkt. 13-54, Case No. 8:11-cv-00395-RWT (D. Md.)		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
1088		ChevronTexaco Merger Powerpoint	DONZ-EXS-000140		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
1089		ChevronTexaco Merger Org Chart	DONZ-EXS-000167		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Authentication (FRE 901/902)
1090	7/5/2012	Indagacion Previa	DONZ-EXS-000127		Incomplete or No Translation Provided; Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
1091		INTENTIONALLY LEFT BLANK			[Withdrawn]
1092		INTENTIONALLY LEFT BLANK			[Withdrawn]
1093		INTENTIONALLY LEFT BLANK			[Withdrawn]
1094		Ecuador Lawsuit: Facts About Chevron and Texaco in Ecuador www.chevron.com			Excluded per Court Order (DI 1539). Chevron further objects as follows: Waste of Time, Unfair Delay, Cumulative (FRE 403)
1095		INTENTIONALLY LEFT BLANK			[Withdrawn]

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1096		Chevron's Views and Opinions on the Ecuador Lawsuit www.theamazonpost.com			Excluded per Court Order (DI 1539). Chevron further objects as follows: Waste of Time, Unfair Delay, Cumulative (FRE 403)
1097		INTENTIONALLY LEFT BLANK			[Withdrawn]
1098		INTENTIONALLY LEFT BLANK			[Withdrawn]
1099		Chicago Fed: Improvements in Production, Larger Economic Environment Remains Weak. www.shopfloor.org			Excluded per Court Order (DI 1539). Chevron further objects as follows: Waste of Time, Unfair Delay, Cumulative (FRE 403)
1100	7/13/2010	Amazon Defense Front Exploits Ecuadorian Hardship in Gulf Publicity Stunt amazondefensecoalitionwatch.wordpress.com	6 pgs		Excluded per Court Order (DI 1539). Chevron further objects as follows: Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1101		FDA: Frente de Defensa de la Amazda www.fda.org.ec	2 pgs		Excluded per Court Order (DI 1539). Chevron further objects as follows: Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1102A	7/26/2008	Chevron's \$16 Billion Problem, July 26, 2008; www.chevrontoxico.org (Hinton 3)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1102B	11/30/2005	Chevron Lobbying Interferes with Ecuador Lawsuit, Warn Rainforest Leaders www.chevrontoxico.org (Hinton 6)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance (FRE 401/402); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1102C	3/17/2005	ChevronTexaco Resorts to Blackmail in Attempting to Win Historical Lawsuit in the Amazon, March 17, 2005; (Hinton 50)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance (FRE 401/402); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1102D	10/20/2005	Military Report on Cancellation of Guanta Inspection www.chevrontoxico.org (Hinton 7)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance (FRE 401/402); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1102E	4/29/2010	Chevron Lawyers Commit Fraud to Undercount Oil Contamination in Ecuador www.chevrontoxico.org (Hinton 8)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1102F	11/8/2010	Video: Chevron Oilfield Worker Describes Toxic Dumping in Ecuador, November 8, 2010 (Hinton 52)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1102G	12/29/2011	Chevron Used Two Prominent U.S. Professors to Defraud Ecuador Court, Documents Reveal, December 29, 2011 www.chevrontoxico.org (Hinton11)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1102H	3/7/2011	Court Affidavit Exposts 18 Years of Chevron's Unethical conduct in \$9.5 Billion Ecuador Lawsuit, March 7, 2011 www.chevrontoxico.org (Hinton12)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1102I	2/28/2008	Chevron Accused of "Unethical Attacks" on court-Appointed Special Master in Ecuador Environmental Trial www.chevrontoxico.org (Hinton13)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1102J	4/13/2008	Ecuadorian Campaigners Win Prestigious Environmental Prize for Fight to hold Chevron Accountable for Rainforest Disaster (4/13/2008) www.chevrontoxico.org (Hinton14)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1102K	12/7/2007	Pablo Fajardo Wins CNN Hero Award, December 7, 2007 www.chevrontoxico.org (Hinton15)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1102L	4/16/2008	Amazon Watch Blasts Consultant Sam Singer for Designing Chevron Attack on Goldman Prize Winners, April 16, 2008 www.chevrontoxico.org (Hinton16)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1102M	2/3/2011	Chevron Threatened Ecuador Judge With Prison Time If He Failed to Grant Motions, Court Papers Say, February 3, 2011 www.chevrontoxico.org (Hinton17)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1102N	7/31/2012	Chevron Censored Shareholders Who Wanted to Challenge Management Over \$19 Billion Ecuador Liability, July 31, 2012 www.chevrontoxico.org (Hinton18)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1102O	9/14/2010	With Discovery Bid, Ecuador Turns Tables on Echevron, September 14, 2010 www.chevrontoxico.org (Hinton24)			Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1102P	9/5/2009	Chevron's Legal Fireworks: Seeking to change its fortunes in a Ecuador case it's expected to lose, the oil giant releases an explosive video, September 5, 2009 (Hinton 25)			Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1102Q	1/23/2012	Chevron Paid \$2.2 Million to Man Who Threatened to Expose Company's Corruption in Ecuador, January 23, 2012 www.chevrontoxico.org (Hinton27)			Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1102R	4/6/2010	Chevron "Cooked" Evidence in Environmental Trial, According to Oil Giant's Own Contractor, www.chevrontoxico.org (Hinton28)			Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1102S	12/29/2011	Chevron Used Two Prominent U.S. Professors to Defraud Ecuador Court, Documents Reveal, December 29, 2011 www.chevrontoxico.org (Hinton29)			Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1102T	10/29/2009	American Who Shot Secret Videos for Chevron in Ecuador is Convicted Drug Trafficker, October 29, 2009 www.chevrontoxico.org (Hinton30)			Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1103		INTENTIONALLY LEFT BLANK			[Withdrawn]
1104		INTENTIONALLY LEFT BLANK			[Withdrawn]
1105		INTENTIONALLY LEFT BLANK			[Withdrawn]
1106		www.truecostofchevron.com	2 pgs		Excluded per Court Order (DI 1539). Chevron further objects as follows: Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1107		INTENTIONALLY LEFT BLANK			[Withdrawn]
1108		INTENTIONALLY LEFT BLANK			[Withdrawn]
1109	2/18/2013	"Response to Claimants' Allegations Regarding Judicial Independence" and exhibits thereto	Annex A to Track 2 Counter-Memorial 60 pgs		Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Not Evidence

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1110	2/18/2013	"Response to Claimants' Allegations Regarding the Criminal Proceedings Against Messrs Veiga and Perez" and exhibits thereto	Annex B to Track 2 Counter-Memorial 8 pgs		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Not Evidence
1111	2/18/2013	"Response to Claimants' Bribery Allegations" and all exhibits thereto	Annex C to Track 2 Counter-Memorial 15 pgs	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Not Evidence; Document should be treated as Confidential and submitted under seal
1112	2/18/2013	"Response to Claimants' 'Ghostwriting' Allegations" and exhibits thereto	Annex D to Track 2 Counter-Memorial 30 pgs		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Not Evidence
1113	2/18/2013	"Response to Claimants' Allegations Regarding Messrs Calmbacher and Cabrera" and exhibits thereto	Annex E to Track 2 Counter-Memorial 31 pgs	X	Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Not Evidence; Document should be treated as Confidential and submitted under seal
1114	2/18/2013	"Response to Claimants' 'Collusion' Allegations" and exhibits thereto	Annex F to Track 2 Counter-Memorial 38 pgs		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Not Evidence
1115	2/18/2013	"Response to Claimants' Allegations of Legal Error" and exhibits thereto	Annex G to Track 2 Counter-Memorial 26 pgs		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Not Evidence

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1116	2/14/2013	"Summary of Lago Agrio's First Instance and Appellate Court Decisions" and exhibits thereto	Annex H to Track 2 Counter-Memorial 31 pgs		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Not Evidence
1117	2/18/2013	Expert Report of Kenneth Goldstein and Jeffrey Short ("LBG Report") and exhibits thereto	Ex. RE-10 to the Track 2 Counter-Memorial 112 pgs		Failure to identify with particularity; Improper expert opinion (FRCP 26); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
1118	2/18/2013	Annex to LBG Report prepared by Harlee Strauss and exhibits thereto	Annex 1 to Ex. RE-10 to the Track 2 Counter-Memorial 62 pgs		Failure to identify with particularity; Improper expert opinion (FRCP 26); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
1119	2/18/2013	Annex to LBG Report prepared by Edwin Theriot and exhibits thereto	Annex 2 to Ex. RE-10 to the Track 2 Counter-Memorial 29 pgs		Failure to identify with particularity; Improper expert opinion (FRCP 26); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
1120		INTENTIONALLY LEFT BLANK			[Withdrawn]
1121		Opacity index 2001	60 pgs		Relevance (FRE 401/402); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1122	1/25/1999	Texaco SDNY reply brief	46 pgs		Aside from rebuttal purposes, Chevron objects as follows: Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
1123	9/18/2013	Article by Alvarez Grau	3 pgs		Incomplete or Inaccurate Description or Document; No other objections, so long as not offered for the truth of the matter asserted
1124		WGI control of corruption indicator chart EC	1 pg		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Improper Summary Exhibit (FRE 1006); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document
1125		WJP Rule of Law Index 2011 Report	145 pgs		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document
1126		Worldwide governance indicators Ec	7 pgs		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Improper Summary Exhibit (FRE 1006); Failure to timely produce (FRCP 26); Incomplete or Inaccurate Description or Document

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1127		Chevron 'Fraud del Siglo' ads against Cabrera	13 pgs		Stipulation as to Chevron advertising in Ecuador (Trial Tr. at 115:23-116:6); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
1201		Medical Article from Australia: "Sharp v. Port Kembla RSL Club"			No objections, so long as not offered for the truth of the matter asserted
1202		Opinion authored by Spigelman in the Seltsam case			No objections, so long as not offered for the truth of the matter asserted
1203		"Strands in a cable" referenced in exhibit (document not identified in transcript)			No objections, so long as not offered for the truth of the matter asserted
1204		Fairchild case from the UK			No objections, so long as not offered for the truth of the matter asserted
1205		Article referencing Amaca v. Booth			No objections, so long as not offered for the truth of the matter asserted
1206		Paper authored by Green re: Insubstantiality of a substantial factor test, 2008			No objection (Cross Exhibit)
1207		Paper dated 2010			No objection (Cross Exhibit)
1208		Transparency International Global Corruption Barometer 2004			No objection (Cross Exhibit)
1209		Transparency International Global Corruption Barometer 2005			No objection (Cross Exhibit)
1210		Transparency International Report on the Transparency International Global Corruption			No objection (Cross Exhibit)
1211		Chart of Corruption Perception Index Over Time for Ecuador with Transparency International Archived documents			No objections, so long as not offered for the truth of the matter asserted

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1212		Milken Institute 2009 Opacity Index: Measuring Global Risks			No objections, so long as not offered for the truth of the matter asserted
1213		PricewaterhouseCoopers The Opacity Index, January 2001			Relevance (FRE 401/402); Inadmissible Hearsay (FRE 801/802/805)
1214		Latinobarometro Online Data Analysis: Sample Selection			No objections, so long as not offered for the truth of the matter asserted
1215	4/20/2012	April 20, 2012 News Article: "En un video, juez Paredes admite que recibio elaborada la senencia"			Inadmissible Hearsay (FRE 801/802/805)
1216	4/20/2012	April 20, 2012 News Article: In one video, Judge Paredes admits receiving the decision made (English)			Inadmissible Hearsay (FRE 801/802/805)
1217	4/20/2012	April 20, 2012 News Article in Politica: "Ex juez Encalada present video de su supuesta reunion con Parades"			Inadmissible Hearsay (FRE 801/802/805)
1218	4/20/2012	April 20, 2012, News Article in El Comercio: "Former Judge Encalada presented video of his supposed meeting with Walls." (English)			Inadmissible Hearsay (FRE 801/802/805)
1219		Transparency International Corruption Perceptions Index, 2011			No objections, so long as not offered for the truth of the matter asserted
1220		How Psychological Science Informs the Teaching of Reading; Rayner, Foorman et al. Psychological Science in the Public Interest V2, No.2, November 2001			Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1221		Stratus Consulting: Setting the Record Straight on the Chevron/Ecuador Lawsuit Settlement			Failure to timely produce - Trial-stamped copy not provided
1306		Steven Donziger diary			Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26)
1307		Bogart Agreement			No objection (Cross Exhibit)
1327		Forensic Consultants web pages			No objection (Cross Exhibit); Failure to timely produce - Trial-stamped copy not provided
1332		Leonard Web pages			No objection (Cross Exhibit)
1333		Hofstra Web Page			Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
1335		Printed pages from Lynch Website			Chevron preserves its objections based on Inadmissible Hearsay (FRE 801/802/805)
1350		Interrogatory Number 10 responses			No objection (Cross Exhibit)
1353					Pursuant to the parties' stipulation, Exhibit DX 1353 consists of 16 individual pages from different documents, and each of the pages in Exhibit DX 1353 is found in the hand-numbered, stamped pages of the Lago Agrio trial record. Chevron has no objections to admitting this document into evidence, so long as it is not offered for the truth of any matter asserted therein. Hard drive produced by Defendants on November 25, 2013 does not contain copy of Exhibit DX 1353.
1354		Affidavit of Alberto Racines, dated October 16, 2009			No objection (Cross Exhibit)
1355		Affidavit of Alberto Racines, dated November 29, 2012			No objection (Cross Exhibit)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1360		6-25-12 taped conversation			No objection (Cross Exhibit)
1361		7-13-12 taped conversation			No objection (Cross Exhibit)
1362		7-31-12 taped conversation			No objection (Cross Exhibit)
1363		11-17-12 Declaration signed in Chicago			No objection (Cross Exhibit)
1364		1-13-13 Declaration signed in New York			Stipulated (Trial Tr. at 1085:8-14); Paper and electronic versions do not match. (Electronic version is missing last page of declaration.)
1365		Timeline chart created in court with Guerra			Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Improper Summary Exhibit (FRE 1006)
1367		May 2, 2013 Guerra deposition			No objection (Cross Exhibit)
1368		Guerra declaration that attaches the "memory aid"			No objection (Cross Exhibit)
1375		INTENTIONALLY LEFT BLANK			[Withdrawn]
1376	2/17/2011	Chevron Claim for Clarification and Amplification Judgments	216.432 (37 Pages)		Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
1376a		Chevron Claim for Clarification and Amplification Judgments English and Spanish translations			Pursuant to the parties' stipulation, Exhibit DX 1376A is Chevron's Motion for Clarification and Amplification of the Trial Court Judgment, filed on February 17, 2011, at 8:00 a.m., found in the hand-numbered stamped pages of the Lago Agrio trial record at pages 216,434-216,464 (Spanish language with English language translation). Chevron has objects as follows: Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1377	3/3/2011	Chevron Appeal Brief 3	216.498-216.689		Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
1377A		Chevron Appeal Brief 3 English and Spanish translations			Pursuant to the parties' stipulation, Exhibit DX 1377A is Chevron's Appeal of the Trial Court Judgment, filed on March 9, 2011, at 4:05 p.m., found in the hand-numbered stamped pages of the Lago Agrio trial record at pages 216,498-216,689 (Spanish language with English language translation). Chevron objects as follows: Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
1378	1/20/2012	Chevron Cassation Appeal (Spanish)	18.540-18.732		Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
1378A	1/20/2012	Chevron Cassation Appeal (English)			Pursuant to the parties' stipulation, Exhibit DX 1378A is Chevron's Cassation Appeal, filed on January 20, 2012, at 8:55 a.m., found at pages 18,540-18,731v of the Appellate Record (Spanish language with English language translation). Chevron object as follows: Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403)
1379		INTENTIONALLY LEFT BLANK			[Withdrawn]

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1379A	5/6/2013	May 6, 2013 Order			Pursuant to the parties' stipulation, Exhibit DX 1379A is Chevron's motion submitting Power of Attorney documents, certified by the court clerk on April 30, 2013. Chevron objects as follows: Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inaccurate or Incomplete Description or Document
1379B		Report of Law #1			Pursuant to the parties' stipulation, Exhibit DX 1379B is Chevron's Cassation Alegato on Res Judicata, filed on May 3, 2013, at 2:33 p.m. (Spanish language with English language translation). Chevron objects as follows: Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inaccurate or Incomplete Description or Document
1379C		Report of Law #2			Pursuant to the parties' stipulation, Exhibit DX 1379C is Chevron's Cassation Alegato on Fraud, filed on May 3, 2013, at 2:30 p.m. (Spanish language with English language translation). Chevron objects as follows: Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inaccurate or Incomplete Description or Document
1379D		Report of Law #3			Pursuant to the parties' stipulation, Exhibit DX 1379D is Chevron's Cassation Alegato on Torts, filed on May 3, 2013, at 2:31 p.m. (Spanish language with English language translation). Chevron objects as follows: Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inaccurate or Incomplete Description or Document

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1379E		Report of Law #4			Pursuant to the parties' stipulation, Exhibit DX 1379E is Chevron's Cassation Alegato on Due Process, filed on May 29, 2013, at 1:16 p.m. (Spanish language with English language translation). Chevron objects as follows: Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inaccurate or Incomplete Description or Document
1379F		Report of Law #5			Pursuant to the parties' stipulation, Exhibit DX 1379F is Chevron's Cassation Alegato on Punitive Damages, filed on May 29, 2013, at 1:15 p.m. (Spanish language with English language translation). Chevron objects as follows: Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inaccurate or Incomplete Description or Document
1379G		Report of Law #6			Pursuant to the parties' stipulation, Exhibit DX 1379G is Chevron's Cassation Alegato on Human Rights, filed on May 30, 2013, at 1:39 p.m. (Spanish language with English language translation). Chevron objects as follows: Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inaccurate or Incomplete Description or Document
1379H		Report of Law #7			Pursuant to the parties' stipulation, Exhibit DX 1379H is Chevron's Cassation Reply on Fraud, filed on September 2, 2013, at 9:22 a.m. (Spanish language with English language translation). Chevron objects as follows: Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inaccurate or Incomplete Description or Document

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1379I		Report of Law #8			Pursuant to the parties' stipulation, Exhibit DX 1379I is Chevron's Cassation Reply on Causation, filed on September 12, 2013, at 4:46 p.m. (Spanish language with English language translation). Chevron objects as follows: Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inaccurate or Incomplete Description or Document
1379J		Report of Law #9			Pursuant to the parties' stipulation, Exhibit DX 1379J is Chevron's Cassation Reply on Res Judicata, filed on September 12, 2013, at 4:45 p.m. (Spanish language with English language translation). Chevron objects as follows: Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inaccurate or Incomplete Description or Document
1380		INTENTIONALLY LEFT BLANK			[Withdrawn]
1381	8/30/2004	email from Calmbacher to Donziger; Subject: Urgent;	CVX-RICO-2342467		Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26)
1382	7/28/2005	email from Calmbacher to Donziger; Subject: Re: Payment	DONZ00031163		Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1383	8/2/2007	Email from Donziger to Kohn; Subject: Does this email work for Stratus?	CVX-RICO 2352463		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26)
1384	1/15/2008	Email from Donziger to Beltman; Subject: Suggested money disbursements	CVX-RICO-2338179		Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26)
1385	2/9/2008	Email from Donziger to Beltman; Subject: Costs	CVX-RICO-2338289-90		Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26); Extra paper version of exhibit does not match electronic or other paper version
1386	2/23/2010	Letter from Susman to Donziger	DONZ00036532-3		Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26)
1387		Article: Venerable Center City law Firm embroiled in Chevron Fraud Case	(4 Pages)		No objection (Cross Exhibit)
1388	5/15/2012	Tolling and Standstill Agreement	(3 pages)		No objection (Cross Exhibit)
1389		Letter to “Joe” Confidential	DONZ00036556		Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1390	11/13/2009	From Yanza and Fajardo to Steven	(4 pages)		Incomplete or No Translation Provided; Relevance (FRE 401/402); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Incomplete or Inaccurate Description or Document
1391	7/26/2010	Letter from Pagueje, Criollo and others to Kohn			Incomplete or No Translation Provided; Excludable subject to DI 1529 at 103-04; Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26)
1405		Wall Street Journal Article used with witness Russell			Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
1410		Information from Russell's website			No objection (Cross Exhibit)
1416		Aldolfo Callejas pleading re: technical and independent assessment of the designated "General Plan of Activities" (Hinton 19)	Received, unclear of document		No objection (Cross Exhibit)
1417		Photos as still shots from the Crude movie			No objection (Cross Exhibit)
1420		Images of President Correa in the Oriente			Excluded per Court Order (Trial Tr. at 470:6-10)
1425		Lab results from 12-13 different judicial inspection sites			Incomplete or No Translation Provided; Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1440		"On the Environment of The Amazon Region of Ecuador"			Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321; Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26)
1441		Recusal Order for Judge Sucumbios			Inadmissible Hearsay (FRE 801/802/805); Third page of document is illegible
1442		INTENTIONALLY LEFT BLANK			[Withdrawn]
1475		Chevron Press Release: History of Texaco and Chevron in Ecuador, Oct. 20, 2005			Failure to timely produce – not identified on exhibit list prior to production for the first time on November 12, 2013 (FRCP 26); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
1476		Chevron Press Release: History of Texaco and Chevron in Ecuador, Jan. 25, 2006			Failure to timely produce – not identified on exhibit list prior to production for the first time on November 12, 2013 (FRCP 26); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
1477		Email chain, beginning with email from Irwin; To: Barry, Subject: LA Times Article on Chevgrn in Ecuador...	CVX-RICO-492199-204		Failure to timely produce – not identified on exhibit list prior to production for the first time on November 12, 2013 (FRCP 26); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1478	3/17/2010	Hotel Bill for Jeffrey Shinder at the St. Julien, Boulder's Hotel and Spa, 3/17/10			Failure to timely produce – not identified on exhibit list prior to production for the first time on November 12, 2013 (FRCP 26); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1479	5/6/2013	Declaration of Craig Smyser in Support of Motion to Withdraw as Attorney in Charge for Defendants Hugo Camacho and Javier Piaguaje	Doc 1114, pages 1-3		Failure to timely produce – not identified on exhibit list prior to production for the first time on November 12, 2013 (FRCP 26); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1480	5/6/2013	Memorandum of Law In Support of Smyser Kaplan's Motion to Withdraw as Attorney in Charge for Defendants Hugo Gerardo Camacho Naranjo and Javier Payaguaje	Doc 113, page 1--8		Failure to timely produce – not identified on exhibit list prior to production for the first time on November 12, 2013 (FRCP 26); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1481	5/6/2013	Memorandum of Law in Support of Keker & Van Nest's Motion to Withdraw as Counsel for Defendants Steven Donziger, The Law Offices of Steven R. Donziger and Donziger & Associates, PLLC	Doc 1110		Failure to timely produce – not identified on exhibit list prior to production for the first time on November 12, 2013 (FRCP 26); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1482		Plaintifs Final Alegato in the Aguinda vs. Chevron lawsuit (English)			Pursuant to the parties' stipulation, Exhibit DX 1482 is the Lago Agrio Plaintiffs' Second Alegato, filed January 17, 2011, at 4:55 p.m., found in the hand-numbered stamped pages of the Lago Agrio trial record at pages 216,125-216,239 (Spanish language) and the Lago Agrio Plaintiffs' Third Technical Alegato, filed on February 1, 2011, at 2:55 p.m., found in the hand-numbered stamped pages of the Lago Agrio trial record at pages 216,252-216,329 (Spanish language and English language translation). Chevron objects as follows: Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1483		Plaintiffs Petition for Clarification (English)	Doc 27-6, pages 1-16		Pursuant to the parties' stipulation, Exhibit DX 1483 is the Lago Agrio Plaintiffs' Motion for Clarification and Amplification of the Appellate Judgment, filed on January 6, 2012, at 4:33 p.m., found at pages 18,178-18,183v of the Appellate Record, with pages 18,170-18,177 of attachments. Chevron objects as follows: Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1484		Fisher Remediation costs spreadsheet	AMPI00015363-68		Failure to timely produce – not identified on exhibit list prior to production for the first time on November 12, 2013 (FRCP 26); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1485		Open Letter from Chevron to Ecuadorians (English)			Failure to timely produce – not identified on exhibit list prior to production for the first time on November 12, 2013 (FRCP 26); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
1486		Open Letter from Chevron to Ecuadorians (English)			Failure to timely produce – not identified on exhibit list prior to production for the first time on November 12, 2013 (FRCP 26); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403)
1487		LAP's Appellate Brief			Pursuant to the parties' stipulation, Exhibit DX 1487 is the Lago Agrio Plaintiffs' Appeal Alegato, filed on April 5, 2011, at 8:40 a.m., at pages 93-151 of the Appellate Record, with pages 37-92 of attachments. Chevron objects as follows: Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1488		LAP'S Response to Chevron's Cassation (Supreme Court) Appeal			Pursuant to the parties' stipulation, Exhibit DX 1488 is the Lago Agrio Plaintiffs' Cassation Alegato, filed on November 29, 2012, at 11:03 a.m., at pages 15-128 of the Cassation Record (Spanish language with English language translation). Chevron objects as follows: Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1500		Hinton Witness Statement as filed			Chevron has moved to strike portions of this witness statement (DI 1667) and supplemented this motion (DI 1703), and hereby incorporates all the objections contained therein. The Court has already ruled that portions of this witness statement are to be stricken. <i>See</i> DI 1713. Chevron's position is that the redacted version of this statement reflecting the Court's order should be submitted; Defendants disagree.
1501	4/12/2008	Editorial: Chevron's legal nightmare in Ecuador; April 12, 2008 (Hinton 1)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1502	2/26/2008	The Populist prescription, Washington Times, February 26, 2008 (Hinton 2)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1503		Question and Answer re: Chevron litigation (Hilton 40)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1504		Chevron's Negligently Substandard Oilfield Waste Disposal Practices in Ecuador, by Douglas Beltman, Status Consulting (Hinton 46)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1505		Aerial photo of Shushufindi Well 38 (Hinton 47)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador

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DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1506		Texaco's Misuse of the TCLP Test in Ecuador, by Douglas Beltman and Dr. Ann Maest (Hinton 48)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1507	11/16/2009	POLITICO: Chevron's lobbying campaign backfires; November 16, 2009 (Hinton 4)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1508		Rep. Linda Sanchez: Chevron's Lobbying Efforts Look Like Extortion (Hinton 5)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1509	11/22/2005	November 22, 2005 Letter to Chairman Bill Thomas, Committee of Ways & Means (Hinton 49)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance (FRE 401/402); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1510		TPH Concentrations in Remediated Pits (Hinton 34)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1511		TPH Concentrations in Remediated Pits (Hinton 35)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1512	10/15/2009	Memorandum from Donziger to Beltman, 10/15/09, RE: Information on Sites Visited, October 8, 20009 (Hinton 38)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1513	5/11/2009	When Chevron Hires Ex-Reporter to Investigate Pollution, Chevron looks Good, May 11, 2009 (Hinton 33)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1514	3/5/2007	Letter to the Director of Vistazo, March 5, 2007 (Spanish and English) (Hinton 9)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - Spanish version produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26); Failure to timely produce – English version produced for the first time on November 7, 2013 (FRCP 26)
1515	3/5/2009	Memo to SRD from Beltman and Maest, Re: 18b gallon figure, March 5, 2009 (Hinton 41)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1516	10/20/2005	New York Times: "Rain Forest Jekyll And Hyde" October 20, 2005 (Hinton 10)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1517	4/19/2011	Duel in the Amazon, Miami Herald, April 19, 2011 (Hinton 53)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1518		"Note" presenting a compilation of cleanup costs and environmental damage assessments. (Hinton 42)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1519		Summary of Environmental Data on Contamination in the Napo Concession, By Douglass Beltman, Stratus Consulting. (Hinton 43)			Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1520	10/30/2009	Revelation Undermines Chevron Case in Ecuador, October 30, 2009; (Hinton 23)			Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1521	8/22/2008	Explanation of Differences in Sampling Results from Chevron and the Plaintiffs in the Judicial Inspections, prepared August 22, 2008 by Stratus Consulting, Inc. (Hinton 45)			Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1522	8/11/2011	Courthouse News Service: New Wrinkle to Chevron Drama in the Amazon, August 11, 2011 (Hinton31)			Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Failure to timely produce (FRCP 26, Judge Kaplan's Individual Rules of Practice at 5, Judge Kaplan's Pretrial Order at 2); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce - produced for the first time with Karen Hinton Witness Statement on October 31, 2013 (FRCP 26)
1525	10/29/2003	Chevron Motion re Procedures for Evidence, Oct. 29, 2003	Ex C-494 to Track 2 Counter-Memorial		Incomplete or No Translation Provided. Other than this objection, no objections, so long as not offered for the truth of the matter asserted.
1526	2/18/2012	Supplemental Declaration of Ponce-Villacis	Ex R-57 to Track 2 Counter-Memorial		Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1527	6/6/2008	Protocolization	Ex R-530 to Track 2 Counter-Memorial		Incomplete or No Translation Provided; Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Failure to timely produce (FRCP 26); Failure to timely produce – not identified on exhibit list prior to production for the first time on November 7, 2013 (FRCP 26)
1528		INTENTIONALLY LEFT BLANK			[Withdrawn]
1554	9/17/2010	Causidelito: Dano O Perjuicia Por Culpa			Chevron preserves its objections of Relevance (FRE 401/402) and Lack of Foundation (FRE 602)
1560	9/17/2010	Court Order: Autos Para Sentencia			No objections, so long as not offered for the truth of the matter asserted
1561	9/30/2010	Court Order: Recusal			No objections, so long as not offered for the truth of the matter asserted
1600		Witness Statement of Moncayo, as filed.			Chevron has moved to strike portions of this witness statement (DI 1697), and hereby incorporates all the objections contained therein.
1601		Witness Statement of Ponce, as filed.			Chevron moved to preclude or limit the testimony of Mr. Ponce (DI 1704), and incorporates all the objections contained therein. Chevron's position is that the redacted version of this statement reflecting Defendants' voluntary withdrawal of paragraphs from the statement should be submitted; Defendants disagree.

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1700		Email from Genevieve Hower; To: Donziger; January 5, 2007; Subject: Re: health annex for Ecuador			Failure to timely produce - does not appear on either Defendants' PTO or amended exhibit list (FRCP 26; DI 1421); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1701		Primer of Oil and Gas Production. Sponsored by the Committee of Vocational Training and the Executive Committee on Training and Development of the American Petroleum Institute	Lago Agrio number 140.620		Failure to timely produce - does not appear on either Defendants' PTO or amended exhibit list (FRCP 26; DI 1421); Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1702		Draft of Environmental Assessment of the PetroEcuador-Texaco Consortium Oil Fields; Vol 1: Environmental Audit Report.	CA1069438-860		No objections
1703		Fugro-McClelland Final Environmental Field Audit For Practices 1964-1990, PetroEcuador-Texaco Consortium, Oriente, Ecuador	CA1068352-618		No objections
1704		INTENTIONALLY LEFT BLANK			[Withdrawn]
1705		INTENTIONALLY LEFT BLANK			[Withdrawn]

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1706		Affidavit of Dr. Adolfo Callejas; 12/1/1995			Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902); Failure to timely produce (FRCP 26)
1707		Affidavit of Dr. Rodrigo Perez Pallares, 12/1/1995			Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1708		Affidavit of Dr. Vincente Bermeo Lanas, 12/11/1995			Failure to timely produce - does not appear on either Defendants' PTO or amended exhibit list (FRCP 26; DI 1421); Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1709		Affidavit of Dr. Enrique Once Y Carbo; 6/29/1989			Failure to timely produce - does not appear on either Defendants' PTO or amended exhibit list (FRCP 26; DI 1421); Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1710		Affidavit of Dr. Adolfo Callejas Ribadeneira; 2/4/2000			Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1711		Affidavit of Enrique Ponce Y Carbo; 2/4/2000			Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1712		Affidavit of Dr. Ridrigo Perez Pallares; 2/4/2000			Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1713		Affidavit of Dr. Sebastian Perez-Arteta; 2/7/2000			Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1714		Affidavit of Dr. Aleiandro Ponce Martinez; 2/9/2000			Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1715		Sworn Statement of Doctor Ricardo Vaca Andrade; 3/30/2000			Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1716		Supplemental Affidavit of Doctor Aleiandro Ponce Martinez; 4/4/2000			Relevance – Aguinda litigation (DI 721); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1717		In the Arbitration Under the UNCITRAL Arbitration Rules: Track 2 Counter-Memorial on the Merits of The Republic of Ecuador			Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321: Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1718		Court Order re: Cabrera Report			Rule of Completeness (FRE 106); Inadmissible Hearsay (FRE 801/802/805)
1719		Defendants Steven Donziger Jury Trial Demanded			Inadmissible Hearsay (FRE 801/802/805)

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
1720		Simon v. Texaco Transcript; April 14, 2010			Failure to timely produce - does not appear on either Defendants' PTO or amended exhibit list (FRCP 26; DI 1421); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805)
1721		Fundacion Natura Letter	Deposition Ex 28A (10/19/06)		Relevance-underlying science in Ecuador litigation (DI 720, 721, 901, 902, 1130, 1321; Trial Tr. at 82:20-22: 186:23-24); Relevance (FRE 401/402); Prejudicial, Confusing, Misleading (FRE 403); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Authentication (FRE 901/902)
1722		Chevron Payments to Borja			Failure to timely produce - does not appear on either Defendants' PTO or amended exhibit list (FRCP 26; DI 1421); Chevron preserves its relevance objections related to the subject matter of the Borja/Nunez bribery solicitation scandal (Trial Tr. at 161:9-13); Relevance (FRE 401/402); Waste of Time, Unfair Delay, Cumulative (FRE 403); Inadmissible Hearsay (FRE 801/802/805); Improper Summary Exhibit (FRE 1006)
1750		Donziger witness statement			Chevron has moved to strike inadmissible testimony of this witness (DI 1722) and supplemented this motion (DI 1725), and hereby incorporates all the objections contained therein. The Court has already ruled and stricken portions of this statement. <i>See</i> DI 1742. Chevron's position is that the redacted version of this statement reflecting the Court's order should be submitted; Defendants disagree.
1800		Javier Piaguaje Witness statement			Chevron has objected to this witness statement (DI 1726), and hereby incorporates all the objections contained therein.

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.

DX Number	DATE	Exhibit Description	Bates Range or Source	Confidential Designation	Objections
8095	11/12/2013	Decision in Maria Aguinda Salazar et al v. Chevron Corp., Case No. 174-2012, and an English translation thereof			Inadmissible Hearsay (FRE 801/802/805). Chevron has no objections, so long as it is not offered for the truth of the matter asserted. The Court admitted this exhibit but not for the truth of the matters asserted. Trial Tr. at 2958:12-2959:11.

¹ Plaintiff's objections are based on Defendants' Trial Exhibit List of November 25, 2013.